

#### **UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

#### REGION VII 901 N. 5TH STREET KANSAS CITY, KANSAS 66101

DEC 2 2 1999

**MEMORANDUM** 

RECD

SUBJECT:

Transmittal of Inspection Report -RCRA

JAN 26 2000

FROM:

Betty Berry, Branch Chief

ARCM/ENSV Kus Gal

RESP

TO:

Jo Ann Heiman, Branch Manager

RESP/ARTD

This memorandum transmits the following inspection report conducted by the Environmental Services Division:

Type: Compliance Evaluation Inspection	Inspection Date: 11/16-17/99		
Facility Name: McDonnell Douglas Corporation Tract 4	Facility I.D. Number: MOD000818971		
Address: 5775 Campus Parkway Hazelwood, Missouri 63042	Activity Number:		
Facility Activity: Aircraft manufacturing systems prove out.	SIC Code: 3721		
NOV/NOPF Issued? Yes Potential SNC? No			
Environmental Justice: Was the inspection conducted in a potential EJ area?	? No		
Multimedia: Screening checklist completed? Yes (Or: Level C multimedia	a inspection completed involving Air & RCRA.) No		
Small Business Regulatory Enforcement Fairness Act (SBREFA): Yes			
Preliminary Findings: Hazardous waste on outside of two drums, past storage contingency plan does not include addresses of emergency coordinator.	e of ignitable hazardous waste less than 50' from property line, and the		
Comments:			

Attachments

RCRA

#### REPORT OF RCRA COMPLIANCE INSPECTION

At: MCDONNELL DOUGLAS CORPORATION TRACT IV

5775 CAMPUS PARKWAY HAZELWOOD, MO 63042 Phone No.: (314) 232-3319 EPA ID No.: MOD000818971

On: November 16th & 17th, 1999

By: U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Environmental Services Division

#### INTRODUCTION

At the request of the Air, RCRA and Toxics Division (ARTD), a RCRA compliance evaluation inspection (CEI) was performed at McDonnell Douglas Corp., Tract IV in St. Louis, MO on November 16<sup>th</sup> & 17<sup>th</sup>, 1999. The CEI was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. The inspection was a Level B Multi-Media Inspection. A Multi-Media Screening checklist is attached to this report (attachment 1). This narrative report and attachments present the results of the CEI.

#### **PARTICIPANTS**

McDonnell Douglas Corp., Tract IV (MDCT4):
Joseph Haake, Group Mgr., Env. & Haz. Materials Services
Bryan Kury, Mgr., Env. & Haz. Materials Services
Alfred McCollough, Specialist
Barb Perry, Support Specialist III

U.S. Environmental Protection Agency (EPA): David N. Whiting, Environmental Engineer

#### INSPECTION PROCEDURE

Upon arrival at MCDT4 I contacted Mr. Byron and Mr. Haake and presented him with my credentials. I explained the purpose and procedure of the CEI to Mr. Byron and Mr. Haake and discussed the confidentiality of business information with them. I explained to Mr. Byron and Mr. Haake my need to collect accurate information and left with them a copy of U.S.C. Sections 1001 & 1002. The inspection consisted of a discussion of operations, wastes generated, waste management practices, a review of pertinent documents and a visual examination of the facility. Information collected during the CEI is recorded on data gathering sheets which are referenced in the report. At the end of the inspection an exit

interview was held with Mr. Byron and Mr. Haake. During the exit interview Mr. Haake acknowledged receipt of the following by his signature: a Notice of Violation, an Inspection Confidentiality Notice form and a Receipt for Documents (attachments 2-4). No claim of confidentiality was made by at the time of the CEI.

#### FACILITY DESCRIPTION

MDCT4 is an advanced manufacturing facility for aircraft related manufacture. Mr. Kury described it is as "proving manufacturing processes before they are implemented on a shop floor." Unit operations include: metal forming, cutting and machining, graphiteresin composite forming, cutting and shaping, alodine metal surface etching, and painting. Two other operations located at MDCT4 are a film and video media group and program offices.

MDCT4 operates out of nine buildings on four blocks (attachment 5). Operations are staffed by about 294 people, two shifts per day and five days per week.

MDCT4 was inspected as a Large Quantity Generator of hazardous waste (LQG).

#### FINDINGS AND OBSERVATIONS

A previous RCRA CEI was conducted by Missouri Department of Natural Resources (MDNR) in June 1991. The operators of MDCT4 have notified as a LQG and have submitted 1995 and 1997 hazardous waste reports to MDNR.

MDCT4 has a sanitary and process wastewater discharge permit issued by the St. Louis Metropolitan Sewer District (attachment 6).

#### Wastes

Wastes generated at MDCT4 are placed in containers, stored on-site temporarily, and then shipped to MDCTract1. MDCT1 is a permitted storage site for MDC. Wastes are shipped from MDCT1 to designated facilities for final disposition. Mr. Haake said the MDCT1 permitted storage site is used as an accumulation and ship-off point for all MDC hazardous wastes generated in the St. Louis metro area.

Hazardous wastes generated at MDCT4 are primarily generated from operations at bldg. 276.

Mr. McCollogh prepared a waste summary for wastes generated at MDCT4 during the last year (attachment 7). Using the summary information prepared by Mr. McCollogh and manifest information, I have prepared

a table of wastes with the pertinent information:

Type of Waste	Waste Codes	Quantity generated in the last 13 mo.
20		
chromic acid(from alodine process)	D002, D007	994 lb
cutting oil	none, non-hazardous	18,731 lb
chlorinated solvent (vapor degreaser)	F001	2,503 lb (note 1 below)
waste paint related material	D001, D035	1,856 lb
used oil	none, non-hazardous	3,422 lb
used oil contaminated with chlor. solvent	F002, D035, D040, F003, F005	460 lb
resin solution (un- used product)	D001	2,400 lb
spent broken lamps	none, recycled universal waste	140 lb
spent whole lamps	none, recycled universal waste	6,010 lb
blast media	D008	18,200 lb
light ballasts	none	900 lb

Note 1: Mr. Kury said use of solvent in the vapor degreaser was discontinued in 1998. He said solvent use was replaced with a non-hazardous aqueous solution in the vapor degreaser (attachment 18 pg. 9).

The waste data management software used at MDC is able to track wastes from the generation site to its transfer to MDCT1. Each container of waste is assigned a container number to aid in tracking. Mr. McCollogh gave me copies of a few examples of manifests and data system printouts to demonstrate their capability (attachment 8).

The hazardous wastes shipped off-site from MDCT1 are sent to a few different designated facilities. Mr. Haake gave me copies of part of two MDCT1 generator hazardous waste quarterly summary reports,

sent to MDNR, which show the location of the designated facilities (attachment 9).

Mr. Haake also gave me copies of information which he said show that MDC has been successful in its waste minimization efforts (attachment 10).

#### RCRA Status

The average amount of hazardous waste generated at MDCT4 is as follows:

blast media	about	1,400	lb/mo
waste paint related material	about	143	lb/mo
chromic acid	about	76	lb/mo
contaminated used oil	about	35	lb/mo

Total average amount generated.. About 1,654 lb/mo

At the time of this CEI there was over 2,200 lb of hazardous waste accumulated on-site (attachment 18 pp. 17 & 11). Therefore, MDCT4 is a LQG under MDNR regulations.

#### Personnel Training

The hazardous waste management training personnel training at MDCT4 appears adequate. Ms. Perry said they rely on area supervisors to identify the persons who help manage hazardous waste at MDCT4 (attachment 18 pg. 12). Ms. Perry said she works with the training data base daily and checks frequently for persons who have overdue training. I obtained a copy of the description of the most recent hazardous waste management training (attachment 11). I obtained training documentation for hazardous waste management training in 1997 and 1998 (attachment 12). Ms. Perry conducts the training and attends annual training herself (attachment 13).

#### Preparedness & Prevention/Contingency Plan & Emergency Procedures

The preparedness and prevention measures taken at MDCT4 appear adequate.

The emergency response procedures are contained in a MDC Standard Facilities Procedure entitled, "Spill Prevention and Response Plan" (attachment 14). The content of this plan appears to address the requirements of a contingency plan, with one exception. The plan does not include the addresses of emergency coordinators (attachments 14 and 18 pg. 14). This is a violation of 40 CFR 265.52(d) (NOV #3).

#### Manifest System, Recordkeeping & Reporting

The use of manifests and LDR notices appears adequate (attachment 18 pp. 10-11).

The operators of MDCT4 have completed a 1997 hazardous waste report and have completed MDNR quarterly waste reports.

#### Use and Management of Containers

The hazardous waste, <90 day container storage area for MDCT4 is located near the northwest corner of bldg. 276 (attachment 15). There was one 55-gallon barrel (drum) of waste chromic acid, D002, in the storage shed at this CEI (attachment 18 pp. 16-17). Storage area inspection records show the storage shed has been used for storage of hazardous waste paint related material, with waste codes D001 and D035, in the past (attachment 16). The near side of the shed is 36.9' from the MDCT4 property line, and the far side of the shed is 48.9' from the MDCT4 property line (attachments 5 pg. 2 and 18 pg. 16). This means ignitable hazardous waste has been stored less than 50' from the property line at MDCT4. This is a violation of 40 CFR 265.176 (NOV #2).

There were three drums of waste blast media being stored outside the storage shed (attachment 18 pp. 16-17). Analysis results show the blast media fails TCLP for lead, D008 (attachment 17). Mr. Haake said the blast media is always stored outside the shed because of its heavy weight. Two of the three drums had waste blast media on the outside of the drums. This is a violation of 40 CFR 265.173(b) (NOV #1). It appeared the waste blast media may have gotten on the outside of the drums when the drums were being filled with waste blast media. I viewed the drums a second time on 11/17/99, and the waste blast media had been cleaned/removed from the outside of the two drums.

I had attempted to obtain photographs of the storage shed and the blast media drums. The film did not advance and no photographs were taken.

#### Summary

At the exit interview, I discussed the violations cited with Mr. Kury and Mr. Haake.

David N. Whiting

Environmental Engineer

Date: 12/13/99

#### Attachments

- 1. Region VII Multimedia Screening checklist
- 2. Notice of Violation
- 3. Inspection Confidentiality Notice form
- 4. Receipt for Documents
- 5. Facility diagrams (2 pages)
- 6. Discharge permit (9 pages)
- 7. Waste generation summary
- 8. Manifests and data system printouts (14 pages)
- 9. MDNR quarterly reports, excerpts (3 pages)
- 10. Waste minimization charts (2 pages)
- 11. Training description (3 pages)
- 12. Training records for 1997 and 1998 (4 pages)
- 13. B. Perry training certificates (3 pages)
- 14. Spill prevention and response plan (29 2-sided pages)
- 15. Storage shed location at bldg. 276
- 16. Waste storage facility inspection checklists (6 pages)
- 17. Analysis, blast media (2 pages)
- 18. Inspection data gathering sheets (21 pages)

#### REGION VII MULTIMEDIA SCREENING CHECKLIST

Facility Mc Donne Dong les Corp Trutt	Facility Ownership	private		Inspector (	avid W	Witting
Street 5775 Compus Parkway	Facility Contact	1/	Re	H 11_US 10	nie Ext (319)	
City Hazelwood County St Louis	Phone (314) 23	1			RCRA	
State MO Zip 63042 Number of Employees	_		525/d+5d/w	Date 1//		9
	70					at.t.i.
1. Are there any permits or registrations in the follow	ing areas? NPDES (	discharge 🛛, preti	reatment 🗹 🗸 404	-Wetlands 🗆 UI	C UST U	PWS 🗆
RCRA ☐ TRI ☐ CAA ☐ Other ☐ Describe:		a yle an a d				11535
2. What does the facility do? Olvered in	confection	y (promi	y manufect	tering pro	cesses la	love
they involement the paccess	mode shop	(loon): 1:8	mtordes ince	lia mous	program	offices.
3. What major raw materials are used? Composition	tes, tilanus	n olumine	em, ottengoi	witting me	Dia Ninti	wellie oil
- Does facility <u>use</u> more than 200 gallons or 1,500	pounds per month	of Acids □, Base	es 🗆, Ammónia 🗆,	Chlorine □, Ch	orinated Solve	ents □,
Inorganic Chemicals □, Organic Chemicals □, I	Explosives 🗖, Fuels	□, Gases □, Sol	vent-Based Paints	□, or Solvents □	J, Other	
- Does facility store on-site more that 100 gallons	or 1,000 pounds of	Acids □, Bases	□, Ammonia □, (	Chlorine □, Chlo	rinated Solven	ts □,
Inorganic Chemicals □, Organic Chemiçals □, I	Explosives □, Fuels	□, Gases □, Sol	vent-Based Paints	□, or Solvents □	1, Other	· Fran
4. Provide brief process description: machinin	e, composi	te forming	c, panling	, alodine	coaling (	surface
pup:	0'	/ 0			0.	167.7
(Check all that apply): Painting/Coating (Water-	based 🔼 Solvent-b	ased 🖾), Printing	□; Reacting □, F	ormulating 🗀, [	istilling 🗆	1. 1. 1
Parts Washers/Degreasing (Water-based 🗷 Ha	logenated-based □	, Non-halogenated	l-based □), Comb	ustion (boiler, fur	naces, oxidize	rs) 🗆
Electroplating (Chrome □, Other		) Electro	less plating (Type_			)
5. Describe each waste generated by the facility:				<u>l</u>	the waste ha	zardous?
Waste Name Generation Process	Quantity/Month	Final Disposition	of Waste How L	ong Stored	No Yes Do	n't know
chromic aciel alockine	=75 lb.			< Qu day	00	
used wil cutting & lake	=1500 B.			"		
resin off- yea commission	= 185 10			4.		. 🗆
spentlamps bothing	= 475 Cb.			1	_ and w	, s, -
Glast media mediatuting	- 14w lb.	36 - 11 1 20 10 10 - 11 1		1	_0 @	
		dipole, 151		. PRIN		
ENVIRONMENTAL JUSTICE (EJ)			engelj (Aregge) in . December in de skriver	1 - 1/4 - 1 - 1		100
1. What type of area is the facility located in? Ind	ustrial 🗗 Busines:	Residential D	I. Rural 🗓 📑 🔻	10、48.6	hizari)	
Does the area appear to be run down, poorly ma	aintained, or have m	any abandoned an	nd dilapidated prope	rties? No 🖾	Yes:□	e des
2. What is the estimated income level of the residen	ts in the area that n	ay be impacted by	the facility? Low	■ Moderate 🗗	-High □ 👍	74.2
3. How close are the nearest normally occupied pro	perties (houses, apa	rtments, schools):	<sub>rd</sub> ≪100'⊠ 100	1000 🗉 1000-	1 mile <b>k</b> 7 > 1	mile:□
NATIONAL POLLUTION DISCHARGE ELIMINATION :	SYSTEM (NPDES), U	NDERGROUND IN	JECTION CONTROL	(UIC), PUBLIC V	VATER SUPPL	Y (PWS)
1. How are wastewaters handled? None On-site	Treatment Munic	ipal Sewer   Storr	n Sewer   Surface	Water   Septic	Disposal Well	Land
Process wastewater 👈 💆 📗		9			.0.	
Non-contact wastewater → □		170				
Sanitary wastewater → □   Comments:		er I			Ц.,	
2. Did you see any wastewater discharges not ident	tified by the facility?	No El Yes □	Location of discha	arge:		
(b)	CAR THE STATE OF T	nce of discharge:	COLUMN THE PARTY OF	LES C. BACCAGOS	(P	HOTO (=1)
3. What is the source of the facility's drinking water	CLESCOTT CHEST STREET		THE PARTY OF TAXABLE PARTY.	er 🗆	ATT OF LESS AND ADDRESS.	
4. Is the facility's water source protected with a bar			es Don't knov	THE RESIDENCE OF THE PARTY OF T		1. 12:11.
	1		100	1. 11		- 4 h
FY99MMCKL.1 GRAY SHADED A	RFAS INDICATE ITEMS YOU	NFFO TO LOOK FOR DUR	ING VISUAL INSPECTION	(2)		-

WETLANDS (CWA - Section 404)	101 eggs
1. Did yoù see any streams, rivers, ponds, lakes, or temporarily wet areas being (or have been) disturbed by filling, dredging, chann	nelizing, damining,
excavating, gravel removal, etc.? No ☑ Yes □ Don't know□ Describe/locate:	
	(PHOTO 💷)
CLEAN AIR ACT (CAA)	
1. Did you see any smoke or dust emissions? (non-steam) No ☑ Yes □ Source: " Time: "	(PHOTO.□) 🖆
2. Did you see any dust leaving the property? No 🖾 Yes 🖂 Source:	2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2
3. In the past 2-3 years, has the facility modified or installed any new air emission points? No Yes Describe: Vapor	
4. Are there stationary air conditioning or refrigeration units that contain? < 50 lbs refrigerant/unit \( \square\) > 50 lbs refrigerant/unit \( \square\)	
Are these units: Self-serviced? ☑ Contract Serviced? □ → Service Company:	
5. Are motor vehicle air conditioning systems: Self-serviced? □ Contract Serviced? □ → Service Company:	None 🖾
RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) AND UNDERGROUND STORAGE TANKS (UST)	ELRAS BLASS
1. EPA Hazardous Waste Identification Number? No □ Yes □ →# MODOCOS 18971 Generator Size ∠&G	
2. Does facility: Treat $\square$ , Burn $\square$ , Landfill $\square$ , or use Surface Impoundments $\square$ , for on-site hazardous waste management? No E	7
3. Did you see large numbers of drums (>≥15) of <u>unknown</u> materials stored in an "abandon-like" manner? No ☑ Yes ☐	
Describe:	(PHOTO □)
4. Did you see any hazardous waste containers; drums, or tanks <u>leaking?</u> No □ Yes ☑	(1000)
Describe: waste blass mula residue on tur drums	(PHOTO ☐)
5. Did you see any signs of spills or releases (e.g., dead or stressed vegetation, stains, discoloration)? No 🗹 Yes 🗆	(1101012)
Describe:	- (PHOTO □)
	( <u>rn</u> o≀o □ /
Describe: June the Chart Frederic Government of the Constitution o	(PHOTO 🗆)
7. Does facility have any <u>past</u> or <u>present</u> underground storage tanks that contain petroleum, used oil, or hazardous substances?	No 🖾 Yes 🗆
8. Does facility have any underground fuel storage tanks for emergency generators? No 🗹 Yes 🗆	MO ET 162 CT
EMER. PLANNING & COMMUNITY RIGHT TO KNOW ACT (EPCRA), TOXIC SUBSTANCES CONTROL ACT (TSCA) & PCB's (Polychlori	inated Dinhanula)
House Toxic Charried Delegas Forms (Form D) have not it that a 1 0 1 0 10 1000 to 1000	titres why you
2. Have Hazardous Chemical Inventory Forms (Tier II ) been submitted to local Emergency Planning Committees or fire department:	
B. Does facility import or manufacture a chemical substance? No  Yes Describe type and intended use: a different	reffic dest
4. Does facility have equipment containing PCB's >500 ppm in storage or service — that is leaking [], not labeled [], or, not regist	med To No E
SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)	rered LI! No Leta
1. Does facility have above ground <u>oil</u> (petroleum, synthetic, animal, fish, vegetable) tanks, with an aggregate volume > 1320 galle	one2 No □ Voc <i>i</i> □
Is there an SPCC Plan? No □ Yes ☑ Is there secondary containment? No □ Yes ☑ 35	OIIS: NO THE LEST
Is oil <u>leaking</u> and threatening to reach waters of the State or U.S.? No \(\sigma\) Yes \(\sigma\) Describe:	(DUÑIO)
TOTAL METALLINE AND PROPERTIONS AND STREET	(PHOTO 🗆)
faculta sign (4 mg)	was stones
J H said some a	s home ene prod
Are rinsates handled in an environmentally sound manner? Yes □ No □ → Describe:	(PHOTO 10)
2. Do workers use personal protective equipment (gloves, long sleeve shirts, coveralls) when mixing, loading, or applying? No D	□ Yes'□

# Notice of Violation Pursuant to Requirements of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: Mc Donnell Y Address: 5775 Cam	Douglas Corp. Tract TV
Hazelware	MO 63642
EPA ID Number: MODOOO ?	
	to the following areas of noncompliance with state and federal regulations. order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA tions resulting from the the inspection.
Citation	Description of Violation
10 CFR 265.173(b) 10 CSR 25-5.262(1) 40 CFR 265.176 10 CSR 25-5.262(2)(c)(6)	Howardous weste on outside of two Sigethen thems.  Part storage of ignitable beer stores weste less then 50' from proplety line.
40 CFR 265.52(d) 10 BSR 25.5.262(1)	Continue que den doces est in electro com resol
	After the second
include a description of all corrective actions. The response should be submitted to:  U. S. Env.  A 1  901	ironmental Protection Agency, Region VII  RTD/RESP  N. 544 54.
ATTN	Kendra Kennell
If you have any questions about this Notice of (319) 338-6959, or Key (913) 551-7136.	or wish to discuss your response, you may call me at (Compliance Officer) at
This Notice prepared by <u>Jawe M.</u>	Whiting Date: 11/17/99
The undersigned person acknowledges that h	ne/she has received a copy of this Notice and has read same.
Printed Na Signature: Title:	

Page \_\_ of \_\_

2-1

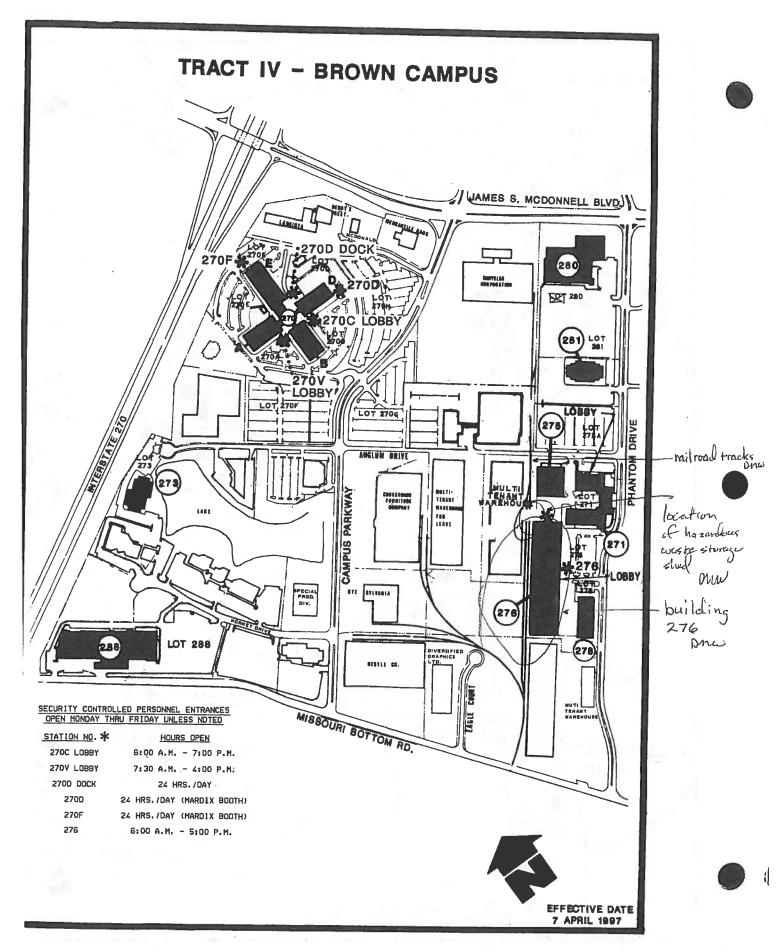
# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY CONFIDENTIALITY NOTICE

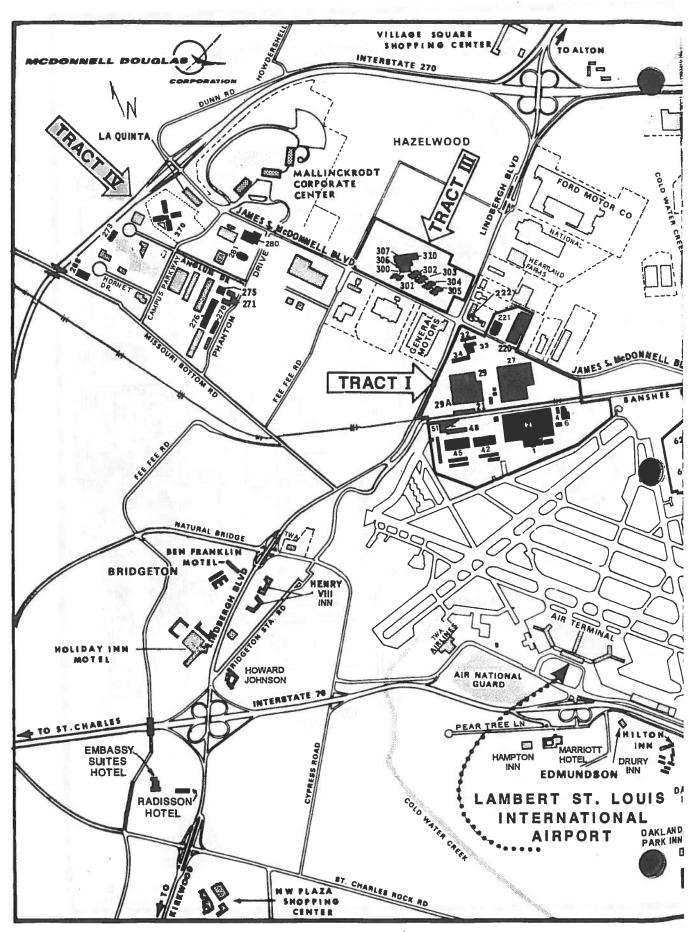
Facility Name  Me Donne Douglas Corp. Tract IV  Facility Address
5775 Campus Parkway Hazelwood MO63042
Inspector (print)
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115 Date
The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:
<ol> <li>Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.</li> </ol>
2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.
Information that you claim confidential will be held as such pending a determination of applicability by EPA.
I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.
Facility Representative Provided Notice (print) Signature/Date
JOE HARRE DO Heals 11/199
I have received this Notice and <u>DO</u> want to make a claim of confidentiality.
Facility Representative Provided Notice (print)  Signature/Date
Information for which confidential treatment is requested:
The second secon

(Rev: 4/15/98)

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY RECEIPT FOR DOCUMENTS AND SAMPLES

Mc Jounel Douglas Corp. Tract IV
5775 Campus Parkway Hazelwood MD 63042
Documents Collected? YES(list below) NO
Samples Collected? YES (list below) NO Split Samples: YES NO
Documents/Samples were: 1)Received no charge 2)Borrowed 3)Purchased
Amount Paid: \$ Method: Cash Voucher To Be Billed
The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.
Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:
1) Proporty diagrams (Zpages)
Stores Noulde Procedure (57 reges) corrections real
Jan in contifuention & Bry (3 suger)
1) Personnettrouses documents (7,000)
Waste constron that IV 10/1/98 to 11/16/99
) discharge permit to St/ metro district (9 saces)
Facility waste reduction chate (Zrages)
5) Plant Diagram
Menteres & relater Novements (16 pares)
3) Glast meder ancluses, (de/99 (Essens)
1) Traction Journaltation (oraces)
Facility Representative (print) Signature/Date
JOE HARKE JOE HOOR 11/17/99
David M. Whiting And Malle 11/17/99
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115
(rev:1/20/93)







### MEMODOMAN St. Louis Sewer District

Department of Environmental Compliance 10 East Grand Avenue St. Louis, MO 63147-2913 (314) 436-8710 FAX (314) 436-8753

December 23, 1997

Bryan E. Kury Manager McDONNELL DOUGLAS AEROSPACE Dept. 464C, Building 110 Mailcode S111-1099 P.O. Box 516 St. Louis, MO 63166

RE: Discharge Permit No:

For premise at:

07113005-01

Building 276 (Tract 4) 5547 Phantom Drive Hazelwood, MO 63042

Dear Mr. Kury:

Enclosed is the Metropolitan St. Louis Sewer District Industrial Wastewater Discharge Permit for the premise identified above. This permit is issued pursuant to the federal pretreatment regulations in 40 CFR 403 as amended October 25, 1995. This permit has been prepared based on information that you supplied in the District's Industrial User Questionnaire, on results from previous wastewater samplings and inspections and on requirements contained in existing MSD ordinances and state and federal regulations.

Except as noted in this paragraph, the terms and conditions of this permit renewal are substantially the same as in the previous permit. The sampling point description for sampling point 001 has been updated to reflect current information. Additionally, the number of parameters to be monitored at sampling point 001 has been reduced. However, the requirement to monitor and report Chromium at sampling point 001 has been added. Several other minor changes have been made to improve the clarity of the document.

The previous permit, effective July 15, 1996, is voided as of the effective date of the enclosed permit.

Monitoring reports required by the conditions of this permit must be submitted quarterly for the life of the permit. The first report due date, for this reissued permit, is based on a complete calendar quarter monitoring period. The permittee remains responsible for reporting for the preceding calendar quarter under the previous permit. Copies of the necessary report forms are enclosed.

If you disagree with any of the terms or conditions of this permit please inform us, in writing, within 15 working days of receipt. Absence of a response within this time frame will be deemed acceptance, by you, of the provisions of this permit. You may contact us at 436-8756 at any time if you have any question about your permit.

Sincerely, METROPOLITAN ST. LOUIS SEWER DISTRICT

Grabski Fabian T. Assistant Engineer

Enclosures

METROPOLITAN ST. LOUIS SEWER DISTRICT DEPARTMENT OF ENVIRONMENTAL COMPLIANCE INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NO: 07113005-01

EFFECTIVE DATE: JANUARY 01, 1998 EXPIRATION DATE: SEPTEMBER 30, 2001

ISSUED TO: McDONNELL DOUGLAS AEROSPACE - EAST

BUILDING 276, TRACT 4 5547 PHANTOM DRIVE HAZELWOOD, MO 63042

SIC NUMBER(S): 3721

TOTAL NUMBER OF PERMITTED DISCHARGE POINTS: ONE SAMPLING PT. REF. NUMBER(S): 001

In accordance with the provisions of the Federal Pretreatment Regulations (40 CFR 403) and Metropolitan St. Louis Sewer District Ordinance No. 8472, the permittee is hereby authorized to discharge wastewater into the Metropolitan St. Louis Sewer District's sanitary or combined sewer system. All discharges so authorized shall be limited and controlled pursuant to the terms and conditions of this permit.

Noncompliance with any term or condition of this permit shall constitute an ordinance violation. If formal enforcement action is required to gain compliance, the permittee who is found guilty of a violation shall be subject to fine or imprisonment, or both such fine and imprisonment, for each violation. Each day in which any such violation shall continue shall be deemed a separate offense.

Compliance with the terms and conditions of this permit does not relieve the permittee of the obligation to comply with all other applicable pretreatment regulations, standards, or requirements under local, State and Federal laws, including any such regulation, standard, legal requirement, or law that may become effective during the life of this permit.

This permit only authorizes wastewater discharges identified herein. It does not apply to any other discharge.

TROPOLITAN ST. LOUIS SEWER DISTRICT

Fabian T. Gkabski

Assistant Engineer

Bob Zeman, P.E. Manager of Environmental Compliance

Permit No: 07113005-01
Page No: 2
Effective Date: 01-01-98

#### DISCHARGE LIMITATIONS

SAMPLING POINT REFERENCE NUMBER: 001

SAMPLING POINT LOCATION: MH 200' SW, 15' NW OF N CRNR OF BLDG - FLOW FROM SE

AVERAGE WASTEWATER FLOW (GPD): 96,900

WASTEWATER SOURCE AND CATEGORY: SANITARY + NON-CATEGORICAL PROCESS + NCCW

## POLLUTANT DISCHARGE LIMITS (mg/l unless otherwise specified)

		-	•	
Parameter	======	Limit *	Limit Type **	Sampling Frequency
Flow Biochemical Oxygen Demand Chemical Oxygen Demand Oil and Grease (Total) OH Acidic (s.u.) Less than 7 OH Basic (s.u.) Greater than or equal Temperature (Degrees C) Total Suspended Solids Chromium (Total) Zinc (Total) Total Toxic Organics		*** **** 00 5.5 11.5 60 *** 5.0 3.0 5.52	Daily Avg Daily Avg Daily Avg Instant Instant Instant Instant Daily Avg Daily Avg Daily Avg Instant	*** once/3 mo

<sup>\*</sup> Limits are based on MSD Ordinance 8472 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.A of the Ordinance.

<sup>\*\*</sup> See Section I.A.2 of the permit conditions.

<sup>\*\*\*</sup> Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

<sup>\*\*\*\*</sup> See Section I.A.11 of the permit conditions.

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#### PERMIT CONDITIONS

#### SECTION I - GENERAL CONDITIONS:

#### A. MONITORING AND REPORTING REQUIREMENTS:

- 1. From the effective date of this permit, the permittee shall self-monitor the discharge at each of the identified sampling points at the frequency specified in this permit. The permittee shall submit self-monitoring reports to the District's Department of Environmental Compliance identifying the concentrations of regulated substances in each of these discharges. Each report shall also include a record of all measured or estimated average daily flows during the reporting period.
- 2. The pollutants to be monitored are specified individually for each sampling point. The limitation, limitation type and monitoring frequency are given for each pollutant. Except as noted in paragraph 3, of this section, composite samples shall be collected for all pollutants. The limitation types are defined as follows:

An INSTANT limitation is the maximum allowable concentration of the pollutant in a grab sample for all pollutants except pH and temperature. For pH the INSTANT limitation is the minimum or maximum allowable instantaneous pH value reported in standard units. For temperature, the INSTANT limitation is the maximum allowable instantaneous temperature reported in degrees C.

A DAILY AVG limitation is the maximum allowable concentration of the pollutant in a composite sample collected within a 24 hour period.

A DAILY MAX limitation is the maximum allowable concentration of the pollutant in any sample collected within a 24 hour period.

A MONTHLY AVG limitation is the maximum allowable average concentration of the pollutant determined by calculating the arithmetic average of the concentrations found in all daily samples collected within a calendar month. The concentrations of all daily samples analyzed using the methods specified in this permit must be included in the calculation.

A 4-DAY AVG limitation is the maximum allowable average concentration of the pollutant determined by calculating the arithmetic average of the concentrations found in the daily samples collected on four consecutive <u>sampling</u> days. The sampling days are not necessarily consecutive calendar days.

A daily sample is any sample collected within a 24 hour period.

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- 3. Unless specified otherwise in Section II of these conditions and except for the pollutants listed at the end of this paragraph, all samples collected to satisfy the monitoring and reporting requirements of this permit shall be COMPOSITE SAMPLES made up by combining individual grab samples collected within a 24 hour period. In no case may a composite sample be made from fewer than four grab samples. In all cases the individual grab samples must be adequately spaced so as to ensure a sample that is representative of the permittee's normal operations. Grab samples shall be collected for oil and grease, total phenol, cyanide, sulfide and volatile organics if required. Temperature and pH shall be measured at the point of discharge and the measurements reported as instantaneous values except, if continuous monitoring is employed, reporting shall be as per paragraph 7 below.
- 4. When monitoring is required for Total Toxic Organics (TTO), TTO shall be determined by summing all quantifiable values greater than .01 mg/l for the applicable toxic organics listed in 40 CFR 401.15. For discharges subject to categorical pretreatment standards, the applicable toxic organics are listed in the standard. For all other discharges the organics to be included in the TTO are all of those which are or may be present in the discharge.
- 5. Sampling of all discharges shall be conducted in such a manner as to ensure that the results of individual samples (whether grab or composite) are representative of normal operations and that the results of all samples during the reporting period are representative of the conditions during the reporting period.
- 6. All sampling and analyses performed to satisfy the monitoring and reporting requirements of this permit shall be performed in accordance with the techniques prescribed in 40 CFR 136 and amendments thereto unless other techniques are prescribed for specific parameters.
- 7. If the permittee employs continuous monitoring techniques for pH and/or temperature at any sampling point identified in this permit, unintentional and temporary excursions outside the limitations are allowed subject to the provisions of Article X, Subsection Two-C of Ordinance 8472. The permittee shall include with the quarterly self monitoring reports required by this Section, a summary of the continuous temperature and/or pH monitoring data. For each month, the summary shall show all excursions outside the permitted limitations, the elapsed time for each excursion and the total time for all excursions for temperature and the total time for all excursions for pH.
- 8. If the permittee monitors any of the listed pollutants using the methods specified in this permit, more often than required by this permit, the results of all such additional monitoring and any additional flow measurements shall be included in the self-monitoring reports.
- 9. All self-monitoring reports shall be certified and signed in accordance with the provisions of District Ordinance 8472, Article X, Section Three. The signed reports shall be submitted every three months (Quarterly) to the District's Department of Environmental Compliance. Each report shall be postmarked no later than the 28th day of the month following the end of the monitoring period. The first report is due by April 28, 1998.

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10. If any sampling performed by the permittee using the methods specified in this permit indicates a violation of any permit limitation, the permittee shall notify the District's Department of Environmental Compliance within one business day of becoming aware of the violation. The permittee shall resample the discharge and shall submit the results of the resampling within thirty (30) days of becoming aware of the violation.

11. Unless specified elsewhere in this permit, discharges of Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD) and Total Suspended Solids (TSS) are not limited under the terms of this permit. However, the monitoring values reported will be used by the District to assess the applicability of surcharges under the provisions of the District's Sewer Service Charge Ordinances. Measured values which exceed 300 mg/l for BOD, 600 mg/l for COD and/or 350 mg/l for TSS may be subject to surcharge. If the permittee is currently subject to surcharge, the BOD, COD and TSS values used for surcharge billing are listed in the Special Conditions Section II of this permit.

#### B. CHANGE IN DISCHARGE:

- 1. The permittee shall not significantly increase the average daily volume, or flow rate of discharge or add any significant new pollutants or significantly increase the discharge of existing pollutants set forth in this permit without first having secured an amendment to the permit unless the permit conditions authorize such increase or additions without an amendment.
- 2. The permittee shall notify the District's Department of Environmental Compliance of any proposed significant new or increased discharge. The permittee shall make the notification at least ten (10) business days prior to the date of the planned increase or addition.
- 3. As defined in District Ordinance 8472, Article II, significant new or increased discharge means:
  - a. Any discharge from a new process or facility or a new source.
  - b. Any increase in volume or rate of discharge from an existing process or facility when the new long term average daily volume or rate of discharge will exceed the previous long term average by 20% or more.
  - c. Any addition of a priority pollutant or toxic pollutant not previously present or suspected present in the permittee's discharge.
  - d. Any addition of a hazardous waste subject to, but not previously reported under the reporting requirements in District Ordinance 8472, Article VIII, Section Nine.
  - e. Any increase in mass of an existing regulated pollutant when the new long term average daily mass discharge of that pollutant will exceed the previous long term average by 20% or more.
  - f. Any addition of a new pollutant or any increase in mass of an existing pollutant when the discharge of such pollutant may cause or contribute to interference or pass-through as these terms are defined in District Ordinance 8472, Article II.
  - g. Any new batch discharges when previous discharges from an existing source at the permitted facility occurred on a continuous basis.

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#### PROBLEM DISCHARGE:

1. Problem discharge means any upset, slug discharge, bypass, spill or accident which does or may result in a discharge into the District's system of a prohibited substance; or of a regulated substance in excess of limitations established in this permit and which may: (a) cause interference or pass through; or (b) contribute to a violation of any requirement of the District's NPDES permit; or (c) cause violation of any State or Federal water quality standard.

2. In the event of any problem discharge into the District's system, the permittee shall immediately notify the District's Department of Environmental Compliance by telephone of the incident and shall provide such information as may be required at that time in order to assess the impact of the incident on the District's system or on water quality. Within five (5) business days following any such incident, the permittee shall submit to the District's Department of Environmental Compliance a detailed written report which contains a description of the incident and its cause, location within the permittee's facility, exact dates and times of the period of problem discharge and, if not yet corrected, the anticipated time the incident is expected to continue, and steps taken or planned to correct the current incident and to reduce, eliminate and prevent occurrences of future such incidents.

#### D. BYPASSING PROHIBITED:

The permittee may not bypass any portion of its pretreatment facilities except when necessary to perform essential maintenance and then only if the bypass will not result in a violation of applicable pretreatment standards or requirements. Any other pretreatment facility bypass is prohibited unless:

a. The bypass is unavoidable to prevent loss of life, personal injury or severe property damage;

b. There are no feasible alternatives to the bypass; and

c. In the event of an anticipated bypass, advance notice is provided to the District's Department of Environmental Compliance.

#### E. PERMIT REVOCATION:

This permit may be revoked after thirty (30) days notice to the permittee for cause including, but not limited to, the following causes:

a. A violation of any term or condition of this permit.

b. A misrepresentation or failure to fully disclose all relevant facts in obtaining this permit.

#### F. PERMIT TERMINATION OR MODIFICATION:

1. This permit may be modified after thirty (30) days notice to the permittee following promulgation of new State, Federal or local regulations to ensure compliance with the effective dates contained in any such new regulations.

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Effective Date: 01-01-98

2. Whenever any discharge covered by this permit is permanently eliminated, or when the circumstances upon which the permit was based pursuant to MSD Ordinance 8472 Article VI, Subsection 3.A, change, this permit will be terminated or modified upon verification of the changes by the District's Department of Environmental Compliance.

#### G. PERMIT RENEWAL:

The permittee shall apply for renewal of this permit at least one hundred eighty (180) days prior to the expiration date contained herein.

#### H. PERMIT TRANSFER:

This permit may not be transferred or reassigned. If the premise covered by this permit is sold or otherwise transferred to a new owner, the new owner shall apply for a new permit at least ten (10) days prior to the transfer and shall abide by all of the provisions of Sewer Use Ordinance No. 8472 until the District issues a new permit or denies the application.

#### I. RIGHT OF ENTRY:

In order to ensure compliance with the provisions of this permit, District Ordinances and applicable State and Federal regulations, District representatives may inspect a permittee's treatment, pretreatment or discharge control facilities, or any process or any area of the permittee's premise which may be a source of any discharge or a source of any pollutants contained in any discharge into the District's wastewater system; conduct sampling of such facilities, processes or areas; and examine or copy any permittee's records related to such discharges. Any duly authorized representative of the District upon presentation of proper credentials and after execution of appropriate confidentiality agreements shall be permitted access to appropriate areas of the permittee's premises without prior notice for these purposes. A representative of the user shall, if appropriate, accompany the District representative while the work is being performed and shall assure that all applicable safety rules are being observed by the District's representative.

#### J. RECORDS RETENTION:

The permittee shall retain and preserve, for not less than three (3) years, all records, books, documents, memoranda, reports, sample analysis results, correspondence and any and all summaries thereof relating to the monitoring, sampling and chemical analyses of the permittee's discharge made by or on the permittee's behalf.

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Page No: 8
Effective Date: 01-01-98

#### C. DEFINITIONS:

Unless the context specifically indicates otherwise, the meaning of terms used in this permit shall be as defined in District Ordinance 8472, Article II.

#### L. SEWER USE ORDINANCE:

Unless the context specifically indicates otherwise, the permittee is subject to all the conditions of District Ordinance 8472.

### M. NOTIFICATION AND REPORTING:

1. All notifications and reports required by this permit shall be directed to:

Metropolitan St. Louis Sewer District Department of Environmental Compliance 10 East Grand Avenue St. Louis, Missouri 63147-2913

- 2. Emergency notifications may be made 24 hours a day by calling the Metropolitan St. Louis Sewer District dispatcher at 768-6260.
- 3. During normal business hours, notifications may be made by calling the Department of Environmental Compliance at 436-8710.

#### SECTION II - SPECIAL CONDITIONS:

These Special Conditions supplement and/or amend the General Conditions of Section I. Where there is any perceived conflict between the general and special conditions, the special condition shall govern.

#### A. PROHIBITED DISCHARGES

1. 40 CFR 433 Subpart A process operations are conducted at the permitted premise. Permittee's application states that no process wastes are discharged to the District from 40 CFR 433 Subpart A operations. Therefore the terms of this permit do not authorize discharge of wastes from such operations. Permittee shall certify on each quarterly self monitoring report that such wastes are not discharged.

### THIS IS THE LAST PAGE OF THIS PERMIT

## Manifested Waste- For Tract IV From 10/1/1998 to 11/16/1999

November 16, 1999

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muls cutty oil 037	0.00	0.00	0.00	18,731 P	
Mor solv. from 041d	0.00	0.00	0.00	2,503 P	- discontinual use of vapor digressor = June 98
veste gaint vel mod 043	0.00	0.00	0.00	1,856 P	, l
ASCIL 01 1044.	0.00	0.00	0.00	3,422 P	
il continuente 047 with chlor solvens	0.00	0.00	0.00	460 P	
25in solution 051 (unused product)	0.00	0.00	0.00	2,400 P	Ű
proken lamps 116	0.00	0.00	0.00	140 P	
whole lamps 116-1	0.00	0.00	0.00	6,010 P	
plast media 125 (cutting media)	0.00	0.00	0.00	18,200 P	
light billastr PCB	0.00	0.00	0.00	900 P	
Grand Total =	\$0.00	\$0.00	\$0.00	55,616 P	

7-1

STATE OF MUSSOURI

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

Hazardous Waste Program

P.O. Box 176 Jefferson City, Missouri 65102

573-751-3176

### **HAZARDOUS WASTE MANIFEST**

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS.

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#### ENVIRONMENTAL & HAZARDOUS MATERIALS SERVICES BUILDING 276 CHEMICAL WASTE STORAGE

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## AUG 1 3 1999

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
Hazardous Waste Program
P.O. Box 176 Jefferson City, Missouri 65102
573-751-3176

### **HAZARDOUS WASTE MANIFEST**

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS. INSTRUCTIONS FOR THE COMPLETION OF THIS FORM ARE ON A SEPARATE SHEET.

DEPT. OF NATURAL RESOURCES 573-634-2436 EMERGENCY RESPONSE U.S. COAST GUARD 1-800-424-8802 CHEM TREC 1-800-424-9300

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	if I am a large quantity generator, I certify that I have a prog have selected the practicable method of treatment, storage,	ram in place to reduce the vo	lume and toxicity of waste	gene	erated to the c	legree I h	nave determined to	be econom	nically practicable and that I			
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	Printed/Typed Name	ANALEMENT COORDINATOR	Signature		n 00	,	100		Month Day Year			
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Ī	17. Transporter 1 Acknowledgement of Receipt of Materials		a. Odell 7			0			Date			
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‡	20. Designated Facility Owner or Operator: Certification of recei	ot of hazardous materials cov	ered by this manifest exce	pt as	noted in Usin	19.			Date			
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				1			(A) 00	NSUMER V	VASTE			

## CAVIRONHEHTAL & HAZARDOUS HATERIALS SERVICES 07/20/1999 - DATE PLACES INTO STORAGE

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#### CNVIRONMENTAL & HAZARDOUS MATERIALS SERVICES -BUILDING 27 CHEMICAL WASTE STORAGE

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	ORT. ORAGE	MO £D	OK TO SHIF	GEN. AREA	GEN. OFFIT	CONT.	SAMPLE NO	COM1. STATUS	CONT. REMOVED	OUTGOING MAHIFEST #	DISPUSAL FACILITY ID#
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PARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
Hazardous Waste Program
P.O. Box 176 Jefferson City, Missouri 65102
573-751-3176

## **HAZARDOUS WASTE MANIFEST**

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS.
INSTRUCTIONS FOR THE COMPLETION OF THIS FORM ARE ON A SECOND TO SECOND THE COMPLETION OF THIS FORM ARE ON A SECOND TO SECOND THE COMPLETION OF THIS FORM ARE

EMERGENCY RESPONSE	U.S. COAST GUARD 1-800-424-8802	CHEM TREC 1-800-424-9300	DEPT OF NATURAL RESOURCES 573-634-2436
	Form	Approved OMB No 2	050-0039, Expires 9-30-

Ple	se print or type (Form designed for use on elite (12-pitch) typewriter.)			Approved OMI	B No 2050-0039. Expires 9-30		
	UNIFORM HAZARDOUS WASTE MANIFEST  1. Generator's US EPA ID No. M, O, D, O, O, O, B, I, B, 9, 7, I O, O	tanifest ument No.   4   0   1	2. Page	3	ation in the shaded areas ired by State law.		
	AGenerator's Name and Mailing Address.  SorpTract IV P. O. BOX 516,  McDonnell Douglas CorpTract IV P. O. BOX 516,  Mailcode: S221-1400,  ST. LOWIS, MO. 63166  ATTN: O. M. COLLOUGH	6	A Misecuri Mar D   D   1 B.G.S.L (Gen. 1 001251	2  5   ] Sile Address)	0401		
	5. Transporter 1 Company Name  McDonnell Douglas Corporation  6. US EPA ID Number  M O D 0 0 0 8 1 8	0 6 3	C. MO Trans. II D:Transporter's		<del>19</del> (314) 232-9327		
	7. Transporter 2 Company Name 8. US EPA ID Number	43	E. MO. Trans. IE F. Transporters	Committee of the Commit	820		
	9. Designated Facility Name and Site Address  McDonnell Douglas Corporation - Tract I  Lindbergh & McDonnell Blvd.		G <sup>E</sup> State Facility RRO H. Facility's Pho	268	14)234-2724		
		MOD000818963					
	11. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group (if any))	12. Container Number		13. Total ⊇uantity	14. Unit Wt/Vol.		
$ \forall$	a. Waste emulsified cutting oil, Non-regulated		/		EN WASE COME		
G	* *** ********************************	0014	MA	839	B BME O N		
ENER	b.				EFA WASTE CODE		
AT OR	a de la companya de l				EPA WASTE CODE		
1	d.			- (3)	EPA WASTE CODE		
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	a. S.G. 0.982; MO ID 037	S O I	1 1 15	10	COMMENTS		
	b. b. c.	1 1	1	T.			
	d. d.	1 1		in .			
	* Special Handing Instruction विद्या						
	16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described and are in all respects in proper condition for transport by highway according to applicable international and national government of the second second in the second second in the second second in the second second second in the second	ernment regulaterated to the de essent and future	tions and applic egree I have det threat to huma	able state regu termined to be in health and th	ilations. economically practicable and tha		
	Printed/Typed Name  MARK STRUMS  MOULE  MOULE	11	torn		Month Day Yes		
TR	17. Transporter 1 Acknowledgement of Receipt of Materials	1			Date		
TRANSPORTER	Printed/Typed Name  18. Transporter 2 Acknowledgement of Receipt of Materials	Jarr	NS.		Month Day Yes		
RTER	Printed/Typed Name   Signature   Signature	16	Of and	Har.	Month Day Yes		
F	19. Discrepancy Indication Space	10	. (	3/30/99			
FACIL		eradii °. Su Y	F-77		8-6		
Ţ	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as Printed/Typed Name // // Signature	noted in Item	19.		Date  Month Day Yes		
	Printed/Typed Name Mike Litbert Signature Mike	4. 1.	VIV		A18 175 G		

#### CNVIRONMENTAL & HAZARDOUS MATERIALS SERVICES BUILDING 276 CHEMICAL WASTE STORAGE

CONT. STORAGE	0 MO LD	OK TO	GEN, AREA	GEN. DEPT	CONT. NO	SAMPLE NO	CONT. STATUS	CONT. REMOVED	OUTGOING MANIFEST #	DISPOSAL FACILITY ID*
MISSOURI I	D 037									
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276	037	9	276	445B	E990265	99999	FULL	08/25/1999	01251-0401	
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COTAL - OK TO SHIP ?

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11/16/1999 16:12:17

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
Hazardous Waste Program
P.O. Box 176 Jefferson City, Missouri 65102
573-751-3176

#### **HAZARDOUS WASTE MANIFEST**

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS. INSTRUCTIONS FOR THE COMPLETION OF THIS FORM ARE ON A SEPARATE SHEET.

•				
	EMERGENCY RESPONSE	U.S. COAST GUARD 1-800-424-8802	CHEM TREC 1-800-424-9300	DEFT. OF NATURAL RESOURCES 573-634-2436

d.  J. Additional Descriptions for Materials Listed Above  a.S.G. 0.982; MO ID U37  b. c. d.  d.  65 Special Handling Instructions and Additional Information  a.S.G. 0.982; MO ID U37  b. c. d.  1.65 Special Handling Instructions and Additional Information of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. It I am a large quantity generator, I be report in place to reduce the volume and toxicity of waste generated to the degree I have determined to the economically practicable and that have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, CR, if I am a small quantity generator, I tave made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.  Printed/Typed Name  Signature  Month Day Year  ARAN Bulkeria	lea	se print or type (Form designed for use an elite (12-pitch)	typewriter.)		S. 171	Form	Approved OME	3 No 2050-0039. Ex	pires 9-30-99			
A Description Number of Marketine Liberd Rows   D Fract   T.   No. 1 Co. 1 Company   D.   Tract   T.   No. 1 Co. 1 Company   D.   Tract   T.   No. 1 Co. 1 Company   D.   Tract   T.   No. 1 Co.				- Doc	ument No.	15.139.04	77.		ed areas			
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Additional Description for Massinist Listed Acove   STATE	Н	9. Designated Facility Name and Site Address	10. US E	PA ID Number		and the second	ALCORDO:		V 2 1 4 6 1			
a Waste emulsified cutting oil, Non-regulated    Number   Type   Gaunty   Work   Emwaste		400 West Regent Street Indianapolis, IN 46225  IND 0 3 9 9 9 4 9 7 5										
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a.S.G. 0.982; NO ID U37  b		d	٠, .					医膜1/2	1 1			
#6-Special Handling Instructions and Additional Information 24 Hour Emergency Contact: (314) 232–2285  16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations.  If I am a large quantity penerator, I carrify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have designed attention to the degree I have designed to the degree I have designed to the degree I have designed and early and accurately evaluated and are in all respects in proper condition for transport in place to reduce the volume and toxicity of waste generated to thurn threat to human health and the environment, CR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best vaste management method available to me that I can afford.  Printed/Typed Name  17. Transporter 1 Acknowledgement of Receipt of Materials  Printed/Typed Name  Signature  Month Dey Year  18. Date  Printed/Typed Name  Signature  Month Dey Year  19. Discrepancy Indication Space  SEF ATTACHED NOTICE  SEF ATTACHED NOTICE  Signature  Month Day Year  19. Discrepancy Indication Space  Signature  Month Day Year  Signature  Month Day Year  Printed/Typed Name  Signature  Month Day Year  Signature  Month Day Year  A A A A A A A A A A A A A A A A A A A		a.S.G. 0.982; MO ID 037		8. 6.	T WEEK		4	COMMENTS				
and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations.  If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.  Printed/Typed Name  International Printed/Typed Name  Signature  International and national government regulations and applicable state regulations. If I am a small quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable enternational that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable enternational that I have selected the best waste generator, I can determine the degree I have determined to be economically practicable enternational that I have selected the best waste enternational that I have selected to the test enternational that I have selected the best waste enternational that I have selected to the test enternatio		#5_Special Handling Instructions and Additional Information		-1114	n to ge	nerator	550	OB				
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Printed/Typed Name    Signature		CARY BUFERD		Hung E	Suspi	1		1	14/99			
18. Transporter 2 Acknowledgement of Receipt of Materials  Printed/Typed Name  Signature  Month Day Year  19. Discrepancy Indication Space  SEF ATTACHED NOTICE  20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.  Date  Printed/Typed Name  Signature  Month Day Year  19. Discrepancy Indication Space  SF ATTACHED NOTICE  S-O  20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.  Date  TO AM  19. Discrepancy Indication Space	TR			Simple	$\lambda =$	1						
18. Transporter 2 Acknowledgement of Receipt of Materials  Printed/Typed Name  Signature  Month Day Year  19. Discrepancy Indication Space  SEF ATTACHED NOTICE  20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.  Date  Printed/Typed Name  Signature  Month Day Year  19. Discrepancy Indication Space  SF ATTACHED NOTICE  S-O  20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.  Date  TO AM  19. Discrepancy Indication Space	A N S	MT.	ITH	Signature	NOS	2/1	4	and the control of the control of	241991			
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T 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.  Printed/Typed Name  Month Day Year  1990 139	FAC-L	SEE ATTACH	ED NOTICE	Ē.				8	5-8			
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STATE OF MISSOURI

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

Hazardous Waste Program

P.O. Box 176 Jefferson City, Missouri 65102

573-751-3176

### **HAZARDOUS WASTE MANIFEST**

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS.
INSTRUCTIONS FOR THE COMPLETION OF THIS FORM ARE ON A SEPARATE SHEET.

 EMERGENCY RESPONSE	U.S. COAST GUARD 1-800-424-8802	CHEM TREC 1-800-424-9300	DEPT. OF NATURAL RESOURCES 573-634-2436

Ple	ease print or type (Form designed for use on elite (12-pitch)	typewriter.)				Form Approved OM	B No 20	050-0039. Expires 9-30-99
1	UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. 4  O  D  0  0  0  8  1  8  9	- Docu	anifest ument No.	2. Page	Informa	ation in	the shaded areas State law.
	3. Generator's Name and Mailing Address McDonnell Douglas CorpTrac 5775 Campus Pkwy., Hazelwood, MO 63042 4. Generator's Phone (314) 232-3319	t IV P.O. Box 516, Mailcode: S22 ST. Louis, P	0 4 0 4					
	5. Transporter 1 Company Name	ATTN: 0. Mc CO.	DE ON GH		0012	Trans.ID H-103	1016	The Control of the Co
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П	McDonnell Douglas Corporatio	The second secon		9 6 3	-		-	)'232 <b>2'93</b> 27
П	7. Transporter 2 Company Name	8. US EPA ID Numi	ber	F1. 188	Table of the second	Trans. ID PKI-	800	2 三国本的专注证
Н	PV.				19 1000	porter's Phone	2000	
Н	Designated Facility Name and Site Address	10. US EPA ID Nun	nber		G. State	Facility's ID		
	McDonnell Douglas Corporatio	n - Tract I		9 14		RR0268	12-2	
	Lindbergh & McDonnell Blvd. Hazelwood, MO 63042	9 6 3	H. Facili	ty's Phone (31	4)2	34-2724		
	11. US DOT Description (Including Proper Shipping Name, Ha	zard Class, ID Number and Packing Group	o (if any))	12. Containe Number	rs Type	13. Total Quantity	14. Unit Wt/Vol.	). Waste No.
Y	a RQ Hazardous waste, solid, "sandblast residue", 9, NA		4					ED MYRE CODE 8
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Z	b Used Oil, Non-Regulated			. 2	-	774,4		EM WARTE CROE E
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П	"If unable to deliver to des a) ERG#171	ignated TSD facilit	y, return	to ge	nera	tor."	•	
Н	24 Hour Emergency Contact: (	314) 232-2285						
П	16.GENERATOR'S CERTIFICATION: I hereby declare that the							cked, marked, and labeled,
H	and are in all respects in proper condition for transport by  If I am a large quantity generator, I certify that I have a pro							ically practicable and that I
Ш	have selected the practicable method of treatment, storage quantity generator, I have made a good faith effort to minir	e, or disposal currently available to me which	ch minimizes the pre	sent and futur	e threat t	lo human health and th		
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F	Printed/Typed Name	* Signature	011	1	1			Month Day Year
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5	18. Transporter 2 Acknowledgement of Receipt of Materials			,		•		Date
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	19. Discrepancy Indication Space						z	
F	F I							4-9
18	i		g					20
li	20. Designated Facility Owner or Operator: Certification of rec			1		, ,		00
1	20. Designated Facility Owner or Operator: Certification of rec			noted in tem	19./	//		Date Name
	Printed/Types Name	Signature	-n.K	41	0	A		Month Day Year
١.,	34 FORM 9700-32 (PEV 9-96) MDNR-HWG 10	PREVIOUS EDITIONS A	ADE OBSOLETE	1.11.	cx. 1	- 0	AINIC FOR	S BECYCLED PAPER WHICH

#### ENVIRONMENTAL & HAZARDOUS MATERIALS SERVICES DUILWING 276 CHEMICAL WASTE STORAGE

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	COMT. STORAGE	iiu LD	OK TO SHIP	GEN. APEA	GEN. DEFT	CONT / NO	SAMPLE NU	CONT. STATUS	CONT. REMOVED	OUTGOING MANIFEST #	PACILITY ID#
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## ENVIRONMENTAL & MAZARDOUS MATERIALS SERVICES 10/06/1999 - DATE PLACED INTO STORAGE

CONT. STORAGE	MO ED	OK TO	GEN. AREA	GEN. DEPT	орит, МО	SAMPLE NO	CONT. ZUTATZ	DATE TO STORAGE	INCOMING MANIFEST #	DISPOSAL FACILITY ID#
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			6 j	ī	OTAL - M	ARIFEST RO	0. 01251-	040 <i>4</i>		
					DTAL -	CONTATELL	. STOUAGE	- 27		
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PAGE 1

PRAFTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
Hazardous Waste Program
P.O. Box 176 Jefferson City, Missouri 65102
573-751-3176 OCT 2 9 1999

### **HAZARDOUS WASTE MANIFEST**

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS.
INSTRUCTIONS FOR THE COMPLETION OF THIS FORM ARE ON A SEPARATE SHEE

 NO I TIOO I TON	OT OIT THE OOM! LETTE	NOT THIS TORN ARE	ON A SEFARALE SHEET
EMERGENCY RESPONSE	U.S. COAST GUARD 1-800-424-8802	CHEM TREC 1-800-424-9300	DEPT. OF NATURAL RESOURCES 573-634-2436

lease print or type (Form designed for use on elite (12-pitch) typewriter.)					/B No 20	050-0039, Expires 9-30-9
UNIFORM HAZARDOUS  WASTE MANIFEST  1. Generator's US EPA I  M O D D O O	D No.  8  1  8  9  7  1  0  00	fanifest ument No. 4 0 6	2. Page of _			the shaded areas State law.
McDonnell Douglas CorpTract IV P.0.0 5775 Campus Pkwy., Mailc Hazelwood, MO 63042 ST. L	BOX 516, ode: S221-1400, Ouis, MO.6316, O. McCOLLOUG	6	00	POR NOT THE REAL PROPERTY.		0406
	US EPA ID Number O D 0 0 0 8 1 8	9 6 3	C. MO. T	rans.ID H=10 porter's Phone	September 1	<del>)232-932</del> 7
7. Transporter 2 Company Name 8.	. US EPA ID Number		E. MO. T	frans, ID	e de la composition della comp	Office History
McDonnell Douglas Corporation - Tract I Lindbergh & McDonnell Blvd.	170	0.6.0		Facility's ID RR0268 by's Phone		
Hazelwood, MO 63042  11. US/DOT Description (Including Proper Shipping Name, Hazard Class, ID Number a	O D O O O 8 1 8	9 6 3		, K <sup>3</sup>	14)2	34-2724
		Number	Туре	Total Quantity	Unit Wt/Vol	And had be desirated in a province of the Control of the
a RQ Waste Paint related material, 3, U (D001, D007)	N1263, PGIII	اردها	D M	00464	P	SME ON E
b Mazardous Waste liquid, n.o.s. (Oil c with chlorinated solvents), 9, NA3082	ontaminated	onl	1	0.0141017		ENT WASTE CODE 2
A Company	19	0,0,1	D M	00,4,60	P	SMIE O N E
T c Mercury Containing Lamps for Recyclin O R	9	100	CW	00350	P	SMIE ON E
d.	Ç#			00000		EPA WASTE CODE
		HANDLING CODE				STATE
J-Additional Descriptions for Materials Listed Above aAlso D007/D035/F002/F003/E005; S.G. 0.	99; MO ID 043 a	15 0	11	T 5 70	1	COMMENTS
DAISO D035/D039/D040/F003/F005; S.G. O. OMO ID 116-1 (4ft. Box)	38; WO TD 041 P	Billy and Strikes, Land	11 -	T 10 14		
d. #15 Special Handling Instructions and Additional Information a) ERG#127 b) ERG#171 24 Hour Emergency Contact: (314) 232-22		n to ge	enera	ator."	1	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignr		d above by pro	per shippi	ing name and are cla	ssified, pa	cked, marked, and labeled,
and are in all respects in proper condition for transport by highway according to app  If I am a large quantity generetor, I certify that I have a program in place to reduce have selected the practicable method of treatment, storage, or disposal currently av quantity generator, I have made a good faith effort to minimize my waste generation	olicable international and national gover the volume and toxicity of waste gen valiable to me which minimizes the pre-	emment regul erated to the c esent and futu	ations and degree I h re threat t	d applicable state reg nave determined to b to human health and	julations. e econom the envir	ically practicable and that I
Printed/Typed Name  MARY STEVENS	Signature	10	gen	es		Month Day Year
T 17. Transporter 1 Acknowledgement of Receipt of Materials		4				Date
Printed/Typed Name  Printed/Typed Name  18. Transporter 2 Acknowledgement of Receipt of Materials  Printed/Typed Name	Signature	Sar	SIL	,		Month Day Year / 0 2 7 9 9
18. Transporter 2 Acknowledgement of Receipt of Materials	7 7					Date
T Printed/Typed Name E R	Signature	-	mer.	1 To 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	- 12	Month Day Year
19. Discrepancy Indication Space						
FAC	= 1 1 1 10					8-12
T 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materia	als covered by this manifest except se	noted in Item	19//	1		Date
Printed/Typed Nama	Signature Mill	9-1	1	1		Month Day Year
EPA FORM 8700-22 (REV. 9-96) MDNR-HWG 10 PREV	IOUS EDITIONS ARE OBSOLETE	11	-	CON CON	TAINS 50	RECYCLED PAPER WHIC

ENVIRONMENTAL & HAZARDOUS MATERIALS SERVICES BUILDING 276 CHEMICAL WASTE STORAGE

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#### ENVIRONMENTAL & HAZARDOUS MATERIALS SERVICES 10/27/1999 - DATE PLACED INTO STORAGE

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CONT. STORAGE	MO	OK TO	GEH. AREA	GEN. DEPT	CONT. NO	SAMPLE MO	CONT. STATUS	DATE TO STORAGE	MONIFEST #	MISPOSAL FACILITY ID#
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MISSOURI DEPARTMENT OF NATURAL RESOURCES HAZARDOUS WASTE PROGRAM
P. O. BOX 176
JEFFERSON CITY, MISSOURI 65102
(314) 751-3176

GENERATOR'S NAME
McDonnell Douglas Corp.-Tract I

EPA I.D. NUMBER

M O D 0 0 0 8 1 8 9 6 3

MISSOURI I.D. NUMBER

	GENERATOR'S HAZARDO SUMMARY REPORT - PA		ASTE	MISSOURI I.I	_	001001	63	AH	
N	IOTE > PLEASE READ INSTRUCTIONS	AND WITH	IER PRINT	OR TYPE					
	TENTION: Summarize all shipments made				PORT IDENTIFIC	ATION		United States	Alexander
Ha	azardous Waste Management Facility you h	ave			ENDING (CHECK ONE & F	AND DESCRIPTION OF THE PARTY OF			11.14
	entified in Section G below. Additional Page			30- <u>99</u> (YEA			2.1	PAGE	
	quired for each off-site management facility			31(YEA	R) 🗆 6-30-	(YEAR)		4 OF	10
SE	CTION G:- FACILITY IDENTIFICATION			of the Control of the Control					
No.	ACILITY NAME (NAME OF OFF-SITE LOCATION WHERE WAS	TE MAC DEL	CONTRACTOR OF THE PARTY OF THE						是一个
	AFETY-KLEEN SYSTEMS, INC.	DIE MAYS DEFT	VEKED)			4. FACILITY'S EF	PA I.D. N	DWRFK	
-	FACILITY SITE ADDRESS					- KYD	0 5 3	3 4 8	108
	00 LAGRANGE ROAD								
						6. FACILITY'S MI	ISSOURI	I.D. NUMBE	R
CIT			STATE	ZIP C		THE PARTY OF			
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SE	CTION:H:- WASTE IDENTIFICATION:								
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I N	DESCRIPTION OF WASTE SHIPPED TO THE	EPA H	AZARDOUS	TAX	TOTAL	AMOUNT	UNIT	SPECIFIC	FINAL
E	FACILITY LISTED ABOVE	1	TE NUMBER	CODE (SEE INST.)	15	WASTE	OF MEAS.	1 1	HANDLING
	Waste Trichloroethylene	D040	F001	(022 1110 11)	Or t	MASIE	MEAS	GRAVITI	CODE
1				- A		1,760.00	P	1 1	T50
2	Waste Paint related material	D001	D007						
-	All the second s	D035	F002	- A		69,610.00	P		T50
		F003	F005						
				1					
3	Waste Paint related material	D001	F003	Α					T50
L	PLES BURNING PERSON	F005	Title	7 ^		5,280.00	Р		150
4	Waste Flammable liquid, n.o.s. (flammable/ chlorinated solvents)	D001	D007	A		2.040.00	Р		T50
	Chiomated solvents)	D035	D039			3,040.00	-		150
		D040	F002	1 1					
	Hazardous Waste liquid, n.o.s. (Oil	F003	F005						
5	contaminated with chlorinated solvents)	D039	D040	A		20,200,00	P		T50
-		F003	F005						
			1.000	<del> </del>					
SEC	TION I TRANSPORTATION SERVICES	UTILIZED							
	14. COMPANY NAME			15, MISSOL	IPI ID NO	16, US EPA I.D. N	UMBER		
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3 = 0	CTION: J.: COMMENTS:								



HAZARDOUS WASTE PROGRAM P. O. BOX 176 JEFFERSON CITY, MISSOURI 65102 (314) 751-3176

# **GENERATOR'S HAZARDOUS WASTE SUMMARY REPORT - PART II**

JENERATOR'S NAME

McDonnell Douglas Corp.-Tract I

EPA I.D. NUMBER

MOD000818963

MISSOURI I.D. NUMBER

001001

NC	TE > PLEASE READ INSTRUCTIONS AN	D WITH	R PRINT	OR TYPE	Transaction	logali yu	1117		12.000 2000
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SEC	CTION G FACILITY IDENTIFICATION					4. FACILITY'S EPA	I.D. NUI		
	CILITY NAME (NAME OF OFF-SITE LOCATION WHERE WASTE Dria Disposal Company	WAS DELIVE	ERED)		TORKE HIRO WHILE IN				4.0
c C4	CILITY SITE ADDRESS			1000		ILDO	7.		
434	9 Southport Road			// 5		6. FACILITY'S MIS	SOURI I.	D. NUMBER	1 12
CITY	oria		STATE IL	ZIP COD	61615	EXPENSE.	38	1200	0 3
SEC	CTION H - WASTE:IDENTIFICATION				10.		11.	12.	13.
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1	Hazardous waste, solid, n.o.s. (Wastewater	F006	F019	4=C S	v.749	67,220.00	P		D80
2	pretreatment sludge)  Hazardous waste, solid, n.o.s. (lead) "sandblast residue"	D008		A	Group	11,940.00	Р		D80
शब	CTION I TRANSPORTATION SERVICES L	JTILIZED							(H. 7-2
	14. COMPANY NAME			15, MISSOUR	RI ID NO.	16. US EPA I.D. N	JMBER		
	Peoria Disposal Company			H-1	191	ILD00984	8193		
* * * *	Area Disposal Company			H-2	064	ILD98491	9498	Bw	
SE	CTION.J.=COMMENTS:				and the state of				
	D80: Landfill								
						MANIFF	ST SUMN	ARY REPO	ORT DNR-HWG
MC	780-1097 (5-94)					196 11 111 16		THE	



HAZARDOUS WASTE PROGRAM P. O. BOX 176 JEFFERSON CITY, MISSOURI 65102 (314) 751-3176

# GENERATOR'S HAZARDOUS WASTE SUMMARY REPORT - PART II

GENERATOR'S NAME McDonnell Douglas	Cor	oT	rac	et I									
EPA I.D. NUMBER	М	0	D	0	0	0	8	1	8	9	6	3	
MISSOURI I.D. NUMBER							_	_					

	SUMMARY REPORT - PAR	1 11				0 0 1	0 0 1			
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Haz iden requ	ENTION: Summarize all shipments made t ardous Waste Management Facility you hav tified in Section G below. Additional Pages ired for each off-site management facility ut	∕e are	1. FOR		NDING (CHECK R) [ R) [	ONE & FILL IN YEAR 12-31 (YED) 6-30-99 (YED)	AR) (AR) (AR)	2. PA	GE 3 OF	12
SEC	TION.G FACILITY:IDENTIFICATION		24 11 (E)		35 - 11 H		4. FACILITY'S EPA		MBER	TARREST CONTRACTOR
3. FA	CILITY NAME (NAME OF OFF-SITE LOCATION WHERE WAST itage Environmental Services, LLC.	E WAS DELIVE	ERED)						2 1 9 0	1 2
E EA	CILITY SITE ADDRESS  1 West Morris Street						6. FACILITY'S MIS	SOURI I.	D. NUMBER	1
CITY	anapolis		STATE	ZIP C	ODE 46231			RR	I N O 3	
SEI	TION:H:=WASTE:IDENTIFICATION									42
LIN	7. DESCRIPTION OF WASTE SHIPPED TO THE FACILITY LISTED ABOVE	ЕРА Н	8. AZARDOUS E NUMBER	9. TAX CODE (SEE INST.		10. TOTAL AMOUNT OF WASTE	т	11. UNIT OF MEAS.	12. SPECIFIC GRAVITY	13. FINAL HANDLING CODE
E 1	Waste Chromic acid, solution	D007					2,925.00	Р		T04
2	Waste Hydrochloric acid, solution	D002	D006				585.00	Р		T04
3	Waste Nitric acid	D002	D007	-			11,700.00	Р		T04
4	Waste Sodium hydroxide, solution	D002	D006				23,110.00	Р		T04
5	Waste Caustic alkali liquid, n.o.s. (Sodium tetraborate)	D007					585.00	Р		T04
6	Hazardous waste solid, n.o.s. (chromium)	D007					3,620.00	Р		T04
7	Waste Corrosive liquid, n.o.s. (nitric/hydrofluoric/phosphoric acids)	D002	D004				585.00	Р		T04
8	Waste Corrosive solid, n.o.s.	D002	D007				6,910.00	P		T04
। ਤਵ•	TION I-TRANSPORTATION SERVICES.	UTILIZED								
, b.,	14 COMPANY NAME			15 MISS	OURI ID NO		16 US EPA LD	NUMBER		-
					* *					_
					÷ .			3		
1.2	Hentage Transport, LLC.				H-1464		IND0584	841 <b>14</b>		
SE	THON JCOMMENTS:				1.00					
	A STATE OF THE PARTY OF THE PAR									

T04 Precipitation, reduction, neutralization, filtration, coagulation, fixation, and discharge to POTW.

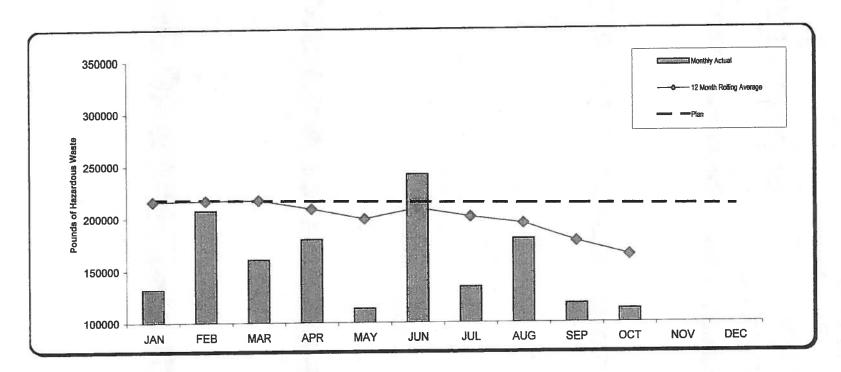
MANIFEST SUMMARY REPORT DNR-HW

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McDonnell Aircraft & Missile Systems St. Louis / St. Charles

# McDonnell Aircraft and Missile Systems St. Louis/St. Charles Hazardous Waste - YTD Oct-99

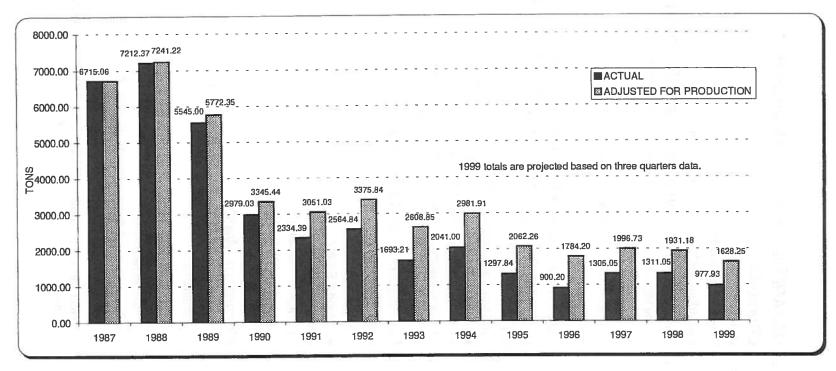


Onthre StL St Charles facilities



McDonnell Aircraft & Missile Systems St. Louis / St. Charles

## McDonnell Aircraft and Missile Systems St. Louis/St. Charles Total Production Related Hazardous Waste



25.41% reduction (15.69% reduction when adjusted) between 1998 and 1999 and a 85.44% reduction (75.75% reduction when adjusted) between 1987 and 1999.

# 1 AZARDOUS WASTE MANAGEMENT Course 22466

Provided by

Environmental and

Hazardous Materials Services Department

# <sup>2</sup> The Resource Conservation and Recovery Act (RCRA)

- is the regulation that tells Boeing how hazardous waste must be managed.
- ◆ Hazardous waste must be managed in a way that minimizes Impact to our health and the environment.
- ◆ Compliance with RCRA is necessary to protect the environment AND our business.

# 3 RCRA

requires hazardous waste handlers to receive annual training.

# 43 HAZARDOUS WASTE MANAGEMENT AT BOEING -ST. LOUIS

- 2,418 tons sent off-site in 1997
- ◆ \$900,000 in treatment costs in 1997
- Permitted Hazardous Waste Storage Facility
- ◆ Licensed Hazardous Waste Transporter
- 10 registered Hazardous Waste Generator Sites

# 5 Hazardous Waste Handling:

### An Overview

- Definitions
- Personal Safety
- ◆ Waste Labeling
- ◆ Container Handling
- ◆ Hazardous Waste Manifest
- ◆ Minimization

# 6 A Hazardous Waste

- Hazardous Waste List (found in the regulations)
- ◆ Characteristic
  - Ignitable (fuel)
  - Corrosive (acid/alkaline)
  - Reactive (explosive)
  - Toxic (has a high concentration of specified contaminants)

# 7 3 Used Oil

is NOT hazardous waste AS LONG AS it isn't mixed with a hazardous waste on the list.

# 8 Working with Chemicals Safely

- Be aware of the chemical's hazards
- Use the appropriate protective clothing and equipment
- Know where water is BEFORE you start
- Know what to do in an emergency

# 9 ENVIRONMENTAL EMERGENCIES

- ◆ Fire or Explosion
- ◆ Chemical Release (Spill or Leak)
- ◆ YOU NEED TO KNOW WHAT TO DO WHEN AN ENVIRONMENTAL EMERGENCY OCCURS.

# 10 FNVIRONMENTAL EMERGENCIES

- AVOID CONTACT WITH THE RELEASED SUBSTANCE
- ♦ WARN OTHERS IN THE AREA
- ◆ CALL 911 IMMEDIATELY FROM A SAFE PLACE
- ◆ PROVIDE AS MUCH INFORMATION AS YOU CAN ABOUT THE RELEASE

# 

- generate as little hazardous waste as possible
- less risk to the environment
- reduced waste management costs
- better public opinion

# 12 I How to minimize hazardous waste

- ♦ Work carefully
- Use as little hazardous material as possible
- Segregate hazardous and non-hazardous wastes

# 13 Use only a waste container that is COMPATIBLE with the waste.

- ◆ Approved by the Department of Transportation
- Clean, not contaminated with other chemicals that could cause reactions
- Obtained by contacting EHMS
- ◆ Labeled with "OK to Fill"

# 14 An "OK to Fill" label

- ◆ (Example of "OK to Fill" label)
- 15 3 Keep waste containers CLOSED and in GOOD CONDITION.
  - ◆ Apply a "Hazardous Chemical Waste" label as soon as waste is in the

container.

- ◆ Don't allow the container to be damaged.
- Keep it SECURELY CLOSED when not in use.
- ◆ Contact EHMS to have it removed.
- 16 The "Hazardous Chemical Waste" label
  - Place on the container as soon as it contains waste.
- 17 The "Empty" label
  - Place on drums that have been emptied of fresh product.
- <sup>18</sup> Solid waste containers have rules, too.
- <sup>19</sup> Solid Waste Management: "Red, Blue, or Brown?"
  - ◆ Red:

Hazardous

Blue:

Non-hazardous, non-burnable

◆ Brown:

Non-hazardous, burnable

Proper solid waste segregation is CRITICAL. Your handouts will provide additional information.

- <sup>20</sup> ☐ If it's your job to empty a red dumpster ...
  - ◆ Make sure that ALL WASTE IS REMOVED
  - Use a tool to remove what doesn't come out easily
  - ◆ Contact Environmental if it won't empty completely
- 21 Transporting hazardous waste
  - ◆ (Example of a manifest)



# Health/Safety/Environmental Compliance Master Training Class Roster

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# Health/Safety/Environmental Compliance Master Training Class Roster

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# Master Training Class Roster

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# Health/Safety/Environmental Compliance Master Training Class Roster

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# ertificate of Achievement This certificate has been awarded to:

Barbara E. Perry

at

St. Louis, Missouri

For successfully completing the Lion Technology Inc. Hazardous/Toxic Waste Management Annual Certification Workshop on the applicable regulations of the United States Environmental Protection Agency and guidelines, standards and procedures for safe and legal management of wastes designated as hazardous.

This training completed as of: 15 October 1999

National Registry of Professionals - Member PIN: 004-6532

1.4 CEUs Awarded

# This certificate has been awarded to:

Barbara Perry

at

St. Louis, Missouri

For successfully completing the Lion Technology Inc.

Hazardous/Toxic Waste Management

Annual Certification Workshop on the applicable regulations of the

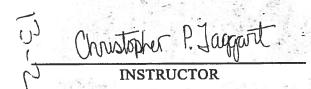
United States Environmental Protection Agency and guidelines,

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wastes designated as hazardous.

This training completed as of: 13 October 1998

National Registry of Professionals - Member PIN: 004-6532



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wastes designated as hazardous.

This training completed as of:

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National Registry of Professionals - Member PIN: 004-6532

J. C. Dunsmoe INSTRUCTOR



BOEING.

# Standard Facilities Procedure

SFP 70-10

TITLE: SPILL PREVENTION AND

RESPONSE (SPR) PLAN

EFFECTIVE: 08 JUN 88

REVISED: 01 AUG 98

McDonnell Aircraft & Missiles Systems St. Louis Facilities

#### A. PURPOSE:

- 1. The purpose of this plan is to set forth procedures to prevent, reduce, or eliminate releases of oil and hazardous substances into the environment, and to control and clean up any release which does occur. The Spill Prevention and Response (SPR) Plan meets the regulatory requirements defined below:
  - 1.1 The SPR Plan meets Federal requirements (40 CFR 112) for a Spill Prevention, Control, and Countermeasures (SPCC) Plan for oil and petroleum products under the Clean Water Act (CWA). In the SPCC regulations, "oil" is defined broadly to include gasoline, diesel fuel, jet fuel, fuel oil, and oily refuse. Boeing St. Louis facilities that could reasonably be expected to discharge oil into navigable waters (including Coldwater Creek) are required to prepare and maintain an SPCC Plan.
  - 1.2 The SPR Plan incorporates state and federal requirements for a Contingency Plan for hazardous waste storage facilities under the Resources Conservation and Recovery Act (RCRA). Boeing St. Louis stores hazardous wastes prior to off-site recycling, reuse, treatment, or disposal. As a result, Boeing St. Louis is required by 40 CFR 264, Subpart D, to prepare a Contingency Plan to address the actions that are required if an accident should occur. The Contingency Plan elements of this SPR Plan cover the corrective action required in the event of a fire, explosion, or unintentional release of a hazardous waste.

SFP 70-10 Page 1

- 1.3 The SPR Plan contains decontamination procedures for employees, equipment, and protective gear used in hazardous waste operations and emergency response, as required by Occupational Safety and Health Administration (OSHA) regulations on "Hazardous Waste Operations and Emergency Response" (29 CFR 1910.120).
- 1.4 The SPR Plan also complies with sections of the Emergency Planning, Emergency Notification, and Community Right-to-Know requirements imposed by the Superfund Amendments and Reauthorization Act of 1986 (SARA).
- 1.5 The Stormwater Pollution Prevention Program is also described in this SPR plan.

#### B. SCOPE:

# -REV- 1. BOEING - ST. LOUIS FACILITIES INCLUDED IN SPR PLAN

McDonnell Douglas Aerospace-St. Louis (BOEING - St. Louis) is an Aerospace Manufacturer with office, warehouse, and manufacturing buildings in St. Louis City, St. Louis County, and St. Charles County. BOEING St. Louis facilities included in this procedure are:

Boeing - St. Louis:

Tracts I and II, near Lambert St. Louis International Airport.

Tract IV, McDonnell Blvd. and I-270.

Tract V, in St. Charles County.

Remote Boeing - St. Louis sites in St. Louis City, St. Louis County, and St. Charles County.

#### 2. REVIEW AND CERTIFICATION REQUIREMENTS

Under the SPCC regulations, the Plan must be reviewed and certified by a Registered Professional Engineer at least once every three years or whenever there is a change in facility design (equipment or plant), construction, or operation which will affect the facility's potential to discharge oil into navigable waters.

Listed below are those portions of the Plan, required under RCRA (Contingency Plan, that must be reviewed and immediately amended whenever:

- 2.1 The facility permit is revised
- 2.2 The Plan fails in an emergency
- 2.3 The facility changes in its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous materials, or changes in the response necessary in any emergency
- 2.4 The list of Emergency Coordinators changes
- 2.5 The list of emergency equipment changes
- 2.6 The three-year SPCC Plan is reviewed.

## C. REFERENCES:

- 1. SFP 70-1 Bulk Removal of Hazardous Waste Liquids
- 2. SFP 70-2 Removal of Small Quantities of Hazardous Waste
- 3. SFP 70-9 Polychlorinated Biphenyls (PCB's)
- 4. SFP 70-12 Emergency Chemical Transfer Kit
- 5. SFP 70-16 Handling and Disposal of Hazardous Solid Waste
- 6. SFP 70-17 Delivery and Removal of Bulk Chemicals using Vendor Tank Truck
- 7. Emergency Plan 1, Master Emergency Control Plan
- 8. Emergency Plan 4, Building Emergency Actions and Procedures
- 9. Emergency Plan 8, Hazardous Material Accident/Incident
- 10. 40 CFR 264 Subpart D, Federal Hazardous Waste Management Regulations
- 11. 40 CFR 112, Federal Water Pollution Control Regulations
- 12. 40 CFR 355, Emergency Planning and Notification Requirements for Extremely Hazardous Substances
- 13. 40 CFR 370, Hazardous Chemical Reporting: Community Right-to-Know
- 14. 29 CFR 1910, OSHA Regulations for Hazardous Waste Operations and Emergency Response
- 15. 40 CFR 122 Clean Water Act (CWA), Stormwater Permitting
- 16. RSMo. 292.600-292.625 Missouri Community Right to Know statute

# D. IMPLEMENTATION OF THE SPILL PREVENTION AND RESPONSE PLAN:

The SPR Plan will be implemented whenever an incident could pose an acute human health hazard or cause contamination of the environment, including the following situations:

- 1. A fire or explosion has caused or can cause the release of toxic vapors or combustion byproducts.
- 2. Use of water or chemical fire suppression agents could result in contaminated runoff.

SFP 70-10 Page 3

- 3. The spill could result in release of flammable liquids or vapors, thus causing a fire or gas explosion hazard.
- 4. The spill could cause the release of toxic liquids or vapors.
- 5. The spill can be contained on-site, but the potential exists for soil or ground water contamination.
- 6. The spill cannot be contained on-site, resulting in offsite soil contamination and/or ground or surface water pollution.

# E. SPILL PREVENTION, EVACUATION, SITE CONTROL, AND NOTIFICATION:

# 1. SPILL PREVENTION PROGRAM

Most elements of the Boeing - St. Louis spill prevention program are applicable to both hazardous waste storage facilities and areas where oil/hazardous materials are stored and used. The following spill prevention practices are in place.

Training. Boeing - St. Louis employees who use 1.1 or handle hazardous materials must receive training in chemical hazards, under OSHA's Hazard Communication rule. All hazardous waste handlers and their supervisors receive annual training as required by RCRA, which covers routine waste handling, hazard identification, chemical compatibility, emergency notification procedures, safe entry, spill control, mitigation, and cleanup procedures. Training records for these persons are maintained by Dept. 464C, and in the central employee training database. First responders like Boeing - St. Louis Fire Services and Boeing - St. Louis Environmental and Hazardous Materials Services personnel receive additional training in spill control, mitigation, and cleanup, under OSHA's Hazardous Waste Operations and Emergency Response rule. This includes at least one hands-on exercise each year specifically related to actions described in this plan. Environmental cleanup crews on contract with Boeing - St. Louis are required to document completion of the OSHA-required training.

- 1.2 Procedures and Procedural Compliance: There are written procedures for most operations that involve transfer or handling of oil/hazardous Some of the major procedures are materials. referenced in Section C above. These procedures are reviewed by Boeing - St. Louis Environmental and Hazardous Materials Services to ensure that spill prevention techniques are incorporated. Spill prevention techniques are incorporated into Standard Facilities Procedures, Manufacturing Methods Procedures, some Process Specifications, and other detailed documents. As a major federal defense contractor, procedural compliance is a requirement for continuation of contracts. Procedural compliance is monitored by government representatives resident at the plant site and in-house teams.
- 1.3 Inspections: Boeing - St. Louis Environmental and Hazardous Materials Services conducts and documents inspections of major storage areas for hazardous wastes and oil/hazardous materials. Inspections are conducted Monday through Friday on hazardous waste container storage areas, above-ground waste tanks, and underground waste tanks. Spill containment and collection equipment trailer and storage bins are inspected monthly. Quarterly inspections are made on all PCB and PCB-contaminated electrical transformers. Boeing - St. Louis Environmental and Hazardous Materials Services inspects two bulk fuel oil storage tanks near Bldg. 120, quarterly inspection of hazardous material storage locations, quarterly inspections of emergency chemical transfer kits, and monthly inspections of exterior aboveground storage tank locations. The remaining single-wall underground product tanks are monitored for product loss by using departments. Interstitial monitors and double wall underground tanks are being installed on a phase-in schedule that meets or exceeds EPA's schedule in 40 CFR 280. Inspections schedules for individual areas are noted in Attachment II.

- Spill Alarms: Double-wall underground tanks for fresh product and waste are equipped with interstitial leak detectors and alarms.

  Industrial sewer lines that serve chemical process tank areas (and associated storage tanks) are equipped with pH detectors which set off alarms. Oil/Water separator systems are equipped with 80% full alarms and shut-off systems. Shop personnel are instructed to call 911 to alert Guard Services in the event of an alarm. Fire Services will contact Environmental and Hazardous Materials Services by telephone (or 24 hour pager) if additional assistance is required.
- Permanent Spill Containment: A variety of permanent spill containment structures are employed, including double-wall tanks, containment pits, dedicated tanks for overflow, berms, curbs, and portable containment buildings. Single-wall underground tanks and outdoor PCB-contaminated transformers which lack spill containment are on a replacement/phase-out schedule described in Sec.F.1.8 below. Spill containment for individual areas is described in Attachment II.
- Contractor Project Spill Containment: For projects which involve a temporary risk of spills (e.g. PCB transformer removals or tank removals), Boeing St. Louis requires the contractor to submit a project spill plan in advance for approval. That plan must describe spill prevention, cleanup materials to be staged at the site by the contractor, and procedures in case of incident. In addition, all contractor employees are provided a "Vendor/Contractor Safety/Environmental Awareness Guide" at the time of badging. This booklet contains information on emergency procedures and environmental protection.

- Environmental Review of New/Modified Facilities:
  Boeing St. Louis Environmental and Hazardous
  Materials Services reviews preliminary design
  drawings on all new or modified facilities. One
  of the items covered in that review is spill
  prevention or secondary containment equipment.
  If the preliminary design is inadequate,
  recommended changes are forwarded to the design
  engineer or Facilities management. For major
  facilities, an Environmental and Hazardous
  Materials Services staff person is incorporated
  into the Facilities/customer team for new and
  major facility modifications.
- 1.8 Modification of Existing Facilities: Based on plant inspections by the spill prevention/response coordinator (Dept. 464C), actual spill incidents, and identification of potential problem areas by others, Boeing - St. Louis Environmental and Hazardous Materials Services is responsible for initiating Requests for Factory Orders and maintenance work requests for modifications to existing facilities. some cases, improved spill prevention and containment can be achieved through physical modifications to existing facilities. In addition to ad hoc modifications, there are three major ongoing programs for risk reduction:
  - 1.8.1 PCB Transformer Replacement and Retrofil of PCB-Contaminated Transformers: In 1984, Boeing St. Louis had an inventory of almost 140,000 lbs. of high-concentration PCB fluid in electrical equipment. Transformer replacements to date have cut this inventory to 385 gallons. Additional transformer replacements are scheduled for the remaining PCB transformer, along with retrofil of PCB-contaminated (50-500 ppm) fluids in the other remaining transformers

- 1.8.2 Underground Tank Replacement: In 1987
  Boeing St. Louis had 59 single-wall
  underground tanks in service. To date
  the number of tanks has been drastically
  reduced through elimination of the
  underground system or upgrades to
  double-wall systems with modern leak
  detection devices. The remaining single
  wall tanks are scheduled for removal or
  replacement with double-wall systems,
  based on risk of leakage and EPA's
  regulatory phase-in schedule.
- 1.8.3 Spill Containment for Drum Staging
  Areas: Portable spill containment
  structures have been purchased and
  installed at significant accumulation
  (less than 90 day) areas for hazardous
  waste drums, and staging areas for drums
  of fresh product. These will be
  relocated and/or additional structures
  purchased as operations relocate and
  change.
- Preventative Maintenance: Preventative maintenance is an effective spill prevention measure. A formal preventative maintenance system and schedule are coordinated through each Facilities Service Center. Preventative Maintenance activities are performed by area maintenance personnel.
- 1.10 Spill Incident Documentation and Follow-Up:
  Boeing St. Louis Environmental and Hazardous
  Materials Services employs a spill
  prevention/response coordinator, who documents
  spill incidents and follows up with the
  individuals responsible. In cases where human
  carelessness is involved, disciplinary action is
  taken by the employee's supervisor. Proper
  documentation of spill frequency and cause is
  also important in identifying needed changes in
  procedure or facility design. Spill
  documentation and site-specific planning are
  conducted using a computer database.

Just-In-Time Delivery: Boeing - St. Louis's inventory of drums and smaller containers of fresh product has decreased dramatically since the 1988 Spill Prevention and Response Plan.

Many chemicals and materials routinely used in manufacturing and maintenance are available on just-in-time delivery from the supplier. This results in lower inventories of hazardous materials at storage locations.

-REV-

Integrity Testing of Bulk Chemical Tanks: Both fresh product and waste acids and caustics are stored in bulk at the Bldg. 52 Chem Mill. In addition to inspection of these above ground tanks, annual ultrasonic testing of tank wall integrity is conducted for the waste caustics.

# 2. STORMWATER POLLUTION PREVENTION PROGRAM

Boeing - St. Louis has implemented a program to prevent pollutants from entering the stormwater runoff from our facilities. Boeing - St. Louis focuses efforts on the identification of sources of pollutants that could potentially affect the quality of the stormwater from our facilities and on the implementation of work practices and controls to minimize or eliminate these pollutants. Environmental and Hazardous Materials Services investigated and inventoried exposed materials that could be potential sources of stormwater pollutants at our St. Louis/St. Charles facilities. Areas with potential impact are evaluated as part of the ongoing spill prevention program. Storage locations were documented and are included in attachment II. Spill and incident reports were reviewed for proper ongoing documentation and follow-up. Appropriate control measures and work practices were implemented as described throughout this plan. Tract I and Tract II facilities near the airport have stormwater discharges addressed in existing NPDES permits. The Missouri Department of Natural Resources has issued Boeing - St. Louis State Operating Permit MO-00004782 for seven discharge points that includes monitoring and reporting requirements for these outfalls.

# Elements of the Boeing - St. Louis Stormwater Pollution Prevention Program

- 2.1 <u>Site Maps:</u> Boeing St. Louis maintains various maps and drawings that include locations of existing outfalls, significant material storage and structural features that control pollutant runoff.
- 2.2 <u>Area Inspections:</u> Routine inspections of areas where hazardous materials may be exposed to stormwater are inspected on a routine basis. Findings are documented and corrective actions implemented to minimize contact of exposed material to stormwater.
- 2.3 Significant Spills and Leaks: Each year spill reports and spill prevention documentation are reviewed to identify additional methods to prevent, reduce and eliminate releases to the environment from Boeing St. Louis activities. Spill documentation includes a review of root cause, severity, and actual cause of each incident. Response actions are reviewed on each spill and future preventive actions are also documented.
- 2.4 Non-storm Water Discharges: Boeing St. Louis investigates non-stormwater discharges by means of dye checking, optical surveillance, and visual examinations of larger lines. Sources to these sewer lines and identification of any deterioration are identified and documented.
- 2.5 <u>Sampling Data:</u> Seven existing NPDES outfalls accept stormwater runoff from Boeing St. Louis locations in Tract I and Tract II. Samples are collected on a monthly basis per NPDES State Operating Permit MO-00004782.
- 2.6 Housekeeping: Boeing St. Louis staffs a full utility crew responsible for maintaining company grounds and property. Examples of the commitment to a clean and orderly facility include roofed storage shelters, recycling centers and workers with responsibility for housekeeping.

- 2.7 <u>Hazardous Material Storage:</u> Numerous methods are used to keep contaminants out of stormwater. This includes dedicated industrial sewer lines and several wastewater treatment facilities, various berms and dikes, and numerous storage areas that are covered or are prefabricated buildings.
- 2.8 <u>Training:</u> Employees at Boeing St. Louis receive many training opportunities designed to benefit personal safety and environmental awareness such as Hazardous Waste Management.
- 2.9 Preventative Maintenance: Preventative maintenance is another aspect of the stormwater program used to control and prevent contaminants from entering stormwater. Equipment is identified and a notice sent to Facilities to service the various control units.
- 2.10 Procedures: Written company procedures are in place to address material handling, spill cleanup and storage requirements. Standard Facilities Procedures, Safety, Health and Environmental Procedures, Material Handling Procedures and Manufacturing Methods Procedures contain information on various aspects of controlling stormwater contamination.

# 3. OIL/HAZARDOUS MATERIAL AND HAZARDOUS WASTE STORAGE FACILITIES

Environmental and Hazardous Materials Services maintains a computer database which contains information on major storage sites for oil/hazardous materials and hazardous wastes. This database contains information such as location and type of storage container or tank, chemical product and primary chemical constituents, maximum amount in storage, leak detection method, secondary containment, and probable spill route. A printout of the most relevant fields is found in Attachment II. The Facilities described in Attachment II are summarized as follows:

- Storage for Hazardous Wastes: Tract I has a RCRA permitted storage area consisting of two segregated spill containment structures under one roof. Waste oils, solvents, and corrosives are stored in these areas with a maximum capacity of 24,640 gallons. Portable spill containment structures are located at Bldgs. 2, 91 and 276 for less than 90 day storage of hazardous wastes. These structures have segregated containment pans to accommodate staging of corrosives as well as oils and solvents. Other less than 90 day containment structures are located at Bldgs. 40, 51, 245, 276, and 598. These are single cell units that are limited to accumulation of compatible oils and solvents. Corrosive materials are stored on dedicated containment pallets within the containment of one of these shelters. Cyanide wastes are stored in Bldg. 22 (maximum capacity of 1,540 gallons); sodium hydroxide wastes are located in two 10,000 gallon tanks at Bldg. 51; and nitric acid wastes are stored in a 6,000 gallon tank at Bldg. 54. Nitric hydrofluoric wastes are stored in three 850 gallon aboveground storage tanks. These six tanks at Bldgs. 22, 51, 52, and 54 all have secondary containment.
- Bldg. 101 Container Accumulation Bldg. for Hazardous Wastes: This facility is limited to less than 90 day storage of hazardous waste containers. The shelter and spill concrete containment curbs are divided into two areas, one for corrosives, the other for oils and solvents. The corrosives containment area is served by an industrial sewer line to the wastewater pretreatment plant. The oil and solvent area slopes to collect and contain any spilled material for disposal. Containers are visually inspected daily for evidence of leakage or deterioration. A pH alarm is located in the sewer downstream from the storage shelter.

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- Above ground Acid and Caustic Storage and Process Tanks: There are three acid tanks (3,300 gallons total) and various other chemical processing tanks containing acids and caustics located near the Bldg. 52 Chem Mill. They all have a containment berm with a drain to the Bldg. 14 wastewater pretreatment plant. Leaks are detected by daily visual inspection and a pH alarm in the industrial sewer. Buildings 27, 101, 220, and 598 also have chemical processing areas with tanks containing acids and caustics. These tanks are protected by means of containment curbing leading to an industrial sewer. The tanks are checked visually by using departments, and the industrial sewers are equipped with pH alarms to detect tank leakage. wastewater pretreatment system that serves these tanks is equipped to neutralize small to moderate size acidic or caustic discharges to industrial sewers. Further treatment is provided by a publicly-owned treatment works. A 5,000 gallon above ground tank holds a nitric acid solution at Bldg. 101.
- 3.4 Above ground Acid/Caustic Storage Tanks--Wastewater Pretreatment Plant: There are five tanks for acids and caustics at the Bldg. 14 pretreatment plant, with a total capacity of about 10,850 gallons. All have concrete base and curbing, and would discharge to wastewater influent for neutralization in the event of tank leakage. Dedicated system pumps and piping are in place for delivery of material to these tanks. The tanks are inspected daily by the pretreatment plant operator
- 3.5 Building 598 Acids and Caustics: Various tanks contain acids and caustics at the Bldg. 598 wastewater treatment plant. These tanks are contained by a concrete floor and curb and are visually inspected daily.
- 3.6 <u>Lubricating and Cutting Oil Tanks:</u> There are 11 aboveground tanks located in Bldg. 27. They are in daily use, and are inside a containment area of concrete floor and curb. Combined capacity is 25,400 gallons.

Storage Areas for Drums/Small Containers Unused Chemical Products: Indoor shop storage areas for small containers generally do not have dedicated spill containment structures. Minor spills on concrete flooring can be recovered without danger of release to the environment. There are, however, three central storage areas for drums/small containers of virgin The "Dope Houses" at Bldgs. 39, hazardous products. 41, and 120 provide indoor or covered storage for these materials. Bldg. 39 has segregated drum storage for corrosives and oil/solvents. These drums are stored under awning-type structures, with asphalt pavement, containment curbs, and a blind sump to capture any spillage. Inside Bldgs. 39, 41, and 120 are a limited number of drums and many smaller containers. storekeepers in these dope houses are bound by strict limitations on segregation of incompatible chemicals and quantities to be stored. The dope house buildings themselves do not have a secondary containment system other than the concrete floor and walls of the building. Total inventories are limited by just-in-time delivery.

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- PCB Electrical Transformers: There is 1 remaining PCB transformer east of the Bldg. 5 boiler-house, containing 385 gallons of high-concentration PCB fluid. This transformer is located in an enclosed room with a sloped concrete floor for spill containment. In addition, there are 4 transformers with minor PCB contamination (50-500 ppm.) containing 11,882 gallons in exterior substations, without secondary containment. A phase-out program for PCB electrical equipment at Boeing St. Louis St. Louis began in 1987, and is continuing. The substations and the transformer are all inspected quarterly.
- PCB Storage Building, Bldg. 39A: This is a prefabricated metal building with integral spill containment structure, used for polychlorinated biphenyl materials stored for disposal. It provides 2,280 gallons of storage and is visually inspected weekly.

- Bulk Compressed Gases: The pressure vessels are located on Boeing St. Louis property, but are leased from the gas suppliers. Most of the compressed gases on site are inert or low-risk gases such as liquid nitrogen, argon, carbon dioxide, and helium. Liquid oxygen is stored at two locations with a total capacity of 2,500 gallons. Propane is stored in four aboveground tanks. There are four storage locations for anhydrous ammonia, each being a 500 or 1000 gallon tank. Chlorine is not stored anywhere on site in bulk, only in individual small cylinders.
- 3.11 Bldg. 14 Sludge Holding Tank: This 120,000 gallon concrete in-ground tank is drained on a 5 year schedule for inspection of the synthetic liner, and levels are checked daily.

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- 3.12 Above ground Used Oil Tank: A 275 gallon waste oil tank at Bldg. 5 boiler-house receives waste oil piped from a separator system and contained in a secondary tank. Leak detection is provided by a high level alarm.
- 3.13 Bldg. 120 Aboveground Fuel Oil Tanks: A 100,000 gallon and a 50,000 gallon tank are protected by separate valved earthen dikes. These dikes are visually inspected weekly by Boeing St. Louis Environmental and Hazardous Materials Services to ensure that valves are in closed position or to detect accumulated precipitation.
- 3.14 Fuel Loading Station: Cargo tankers of jet fuel and unleaded gasoline are loaded into underground storage tanks (136,000 gallons total) at the off-loading station at Bldg. 41. Tanks and lines are all double walled and are equipped with interstitial monitors. The Bldg. 41 offloading station has a containment area for the cargo tanker, which leads to an underground separator and holding tank in case of a spill.

- Underground Fuel Tanks: There are 25 underground tanks for fresh fuel, including the six at the Bldg. 41 fuel loading station. Thirteen of the tanks are double walled containment tanks. Total capacity of the underground fuel tanks is approximately 319,000 gallons; they contain gasoline, jet fuel, diesel fuel, and fuel oil. Boeing St. Louis Environmental and Hazardous Materials Services maintains the Underground Tank Management Plan, which prioritizes tanks for phased replacement or removal from service, integrity testing, retrofitting with automated leak monitors, and/or retrofitting with cathodic protection.
- 3.16 Above ground Fuel Storage: A total of 24 small aboveground tanks contain a total of 7,770 gallons of diesel fuel, gasoline, and jet fuel. Nine of these tanks have some means of secondary containment.
- 3.17 Aircraft Fueling Pits: Fuel Pits 1 through 4 on the Ramp are designed so that any aircraft fuel overfills, leaks, or ruptures will not easily drain to the storm water system. These fuel pits are blind concrete pits.
- 3.18 Underground Waste Fuel Storage: Waste jet fuel is held at Bldg. 28 in an underground storage tank with a 5,000 gallon capacity. Waste fuel separators are located at Bldgs. 45K, Hush House and 40 with a combined holding capacity of 4,800 gallons.
- -REV3.19 Miscellaneous Storage Tanks: A 7,000 gallon aboveground tank at Bldg. 29A holds ethylene glycol and water. Trichloroethylene is held in the degreasers of buildings 101, 220, 27, 29A and 276. Brulin 815GD solution is found in Bldgs. 27, 29, and 101.

# 4. INITIAL INTERNAL SPILL/INCIDENT NOTIFICATION

MDC St. Louis has an internal "911" telephone notification system. Employees are instructed to dial 911 for all fires, explosions, fuel and chemical spills, and medical emergencies. Incidents that involve a risk of environmental release, the 911 dispatcher contacts Boeing - St. Louis Environmental and Hazardous Materials Services staff.

The 911 notification system is modified at Boeing - St. Louis sites where dialing 911 would result in contacting community emergency services. At these sites, the posted directions read as follows:

"In the event of a fire, chemical release or personal injury, etc. report immediately by dialing 911. For minor chemical spills, leaks that do not pose a direct threat to human life, health, property, or equipment, but are a threat to the environment, report immediately to Boeing - St. Louis Fire Services by dialing 8-232-2285."

The initial response to any building remote from the Airport area or Tract V, but covered under this plan, will be by the local fire, ambulance and police departments. Boeing - St. Louis resources will respond to the degree determined to be adequate and appropriate by the Boeing - St. Louis Incident Command.

#### 5. HAZARD ASSESSMENT

5.1 Initial Assessment: Boeing - St. Louis Plant Protection serves as the focal point for the receipt of all initial telephone reports of accidents or incidents involving hazardous material. These types of accidents or incidents are immediately transferred to Fire Services. Upon receipt of an initial call of an accident/incident involving a hazardous material, Fire Services will dispatch trained Fire Fighters to the scene to establish site control, evaluate the degree of severity and begin isolation, containment and/or suppression of the hazardous material. Responsibility will be relinquished to Environmental and Hazardous Materials Services when the hazardous material is properly contained and confined and when the hazardous conditions are controlled or eliminated.

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5.2 Information to be Gathered (40 CFR 264.56): The Fire Services Incident Command will immediately identify the character, exact source, amount, and area extent of the release. The initial identification method will be to utilize visual analysis of the material or container and location of the release. If the released material cannot be identified, samples will be taken for analysis. The Fire Services Incident Command will assess possible hazards, direct or indirect, to property, human health, or the environment.

For initial hazard assessment, information will be obtained on the following:

- 5.2.1 The material spilled or released
- 5.2.2 Location of the release or spillage of hazardous material
- 5.2.3 An estimate of quantity released and the rate at which it is being released
- 5.2.4 The direction in which the spill or vapor or smoke release is heading
- 5.2.5 Any injuries involved
- 5.2.6 Fire and/or explosion or possibility of these events

### 6. EVACUATION AND SITE CONTROL

- In-Plant Evacuation: Boeing St. Louis Plant
  Protection is responsible for providing in-plant
  evacuation and site control. Plant Protection
  coordination with the Fire Services Incident Command
  and the Emergency Response Team Leader is described in
  Emergency Plan 8. Detailed procedures for evacuation
  are described in Emergency Plan 4. See References page
  3, C8 and C9.
  - 6.1.1 If a highly flammable material is released (e.g. propane or natural gas), then a decision, based on volume, immediate danger, and impending explosion, will be made concerning notifying or evacuating personnel in the surrounding area. Any ignition source is prohibited.

- 6.1.2 For spills of liquid chemicals or fuels, an area of isolation will be established around the spill. The size of the area will generally depend on the size of the spill and the materials involved. If the spill is large and involves a tank or pipeline rupture, an initial isolation of at least 100 feet in all directions will be used. Small spills or leaks from a tank or pipe will require evacuation of at least 50 feet all directions to allow cleanup, repair, and to prevent exposure.
- 6.1.3 If the spill results in the formation of a toxic vapor cloud (by reaction with surrounding materials or by outbreak of fire) and it is released (due to high vapor pressures under ambient conditions), further evacuation will be enforced.
- Off-Site Evacuation: Boeing St. Louis Plant
  Protection will be responsible for contacting local law
  enforcement agencies if the situation becomes serious
  enough to require evacuation of surrounding homes or
  businesses. Boeing St. Louis will use the most
  accurate assessment of meteorological conditions by
  calling the Boeing St. Louis Flight Test Radio Tower
  at 22917 from 7 a.m. to 5:30 p.m., Monday through
  Friday. At other times, call the Airport Tower at 4257228. Wind socks are also located at numerous
  hazardous material bulk storage locations for immediate
  assessment of localized wind conditions.

Off-site releases of "Extremely Hazardous Substances" listed in EPA regulations (40 CFR 355) are subject to additional notifications to the local emergency planning committee and Missouri Emergency Response Commission. This reporting requirement is described in the External Reporting section of this SFP, and is the responsibility of Boeing - St. Louis Environmental and Hazardous Materials Services (E.8.).

- 6.3 <u>Site Control:</u> The following actions will be taken in the areas endangered by the incident:
  - 6.3.1 Work in adjacent areas that may contribute to the hazard (e.g., welding, painting, aircraft or vehicular traffic) will be shut down immediately.

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- 6.3.2 All feed lines and additional equipment will be shut down as necessary and practical.
- 6.3.3 Facilities will shut off utilities such as electricity or natural gas if necessary to prevent further hazard. This will only be done if directed by the Fire Services Incident Command.
- 6.3.4 Injured persons will be removed from the danger area by Emergency Response personnel with appropriate personal protective equipment. They will also decontaminate the injured if necessary to prevent danger to emergency medical personnel and facilities.
- 6.3.5 Only those persons actively involved in containing, neutralizing, and eliminating the hazard or providing treatment to the injured will be allowed within the designated hazard area. Boeing St. Louis Plant Protection will secure the area.
- 6.3.6 Only persons possessing a special access identification card will be allowed to enter the secured areas of the accident/incident. All persons at the accident/incident scene will be required to wear the Emergency Response Team (ERT) colored vest. The Fire Services Incident Command has the final authority for access. The Fire Services Incident Command/ERT Leader will be identified at the scene by the ERT vest marked "Incident Command".
- 6.3.7 Periodic monitoring of contaminants or explosive atmosphere shall be performed in accordance with 29 CFR 1010.120.

### 7. NOTIFICATIONS TO NAVY FOR BLDG. 27 PROPERTY

Boeing - St. Louis is a tenant on the Naval Weapons Industrial Reserve Plant (NWIRP), which includes Bldg. 27 and the land adjacent to it, including the Bldg. 39A storage areas for containerized hazardous wastes and PCB's. In the event of an incident involving destruction of this property or likely long-term contamination of the property, U.S. Naval representatives must be notified.

Crisis Management Coordinator
DCMC Executive Officer
Command Section, U.S. Navy

Sta. 22731

Administrative Contracting Officer

Sta. 28298

Safety Engineer U.S. Navy

Sta. 23444

Boeing - St. Louis Property Management Office

Sta. 28312

### 8. EXTERNAL NOTIFICATIONS

Numerous regulatory agency notifications are mandated by State and Federal law. Failure to provide these notifications in a timely manner may result in civil or criminal prosecution. Emergency Plan 8 outlines the major required notifications to agencies such as Missouri Department of Labor, County Medical Examiner, Occupational Safety and Health Administration, Nuclear Regulatory Commission, U.S. Public Health Service, and U.S. Department of Transportation. Notification requirements described below are only those that relate to environmental protection, specifically those notifications that are the responsibility of Boeing - St. Louis Environmental and Hazardous Materials Services, Dept. 464C.

### 8.1. Reportable Releases of Hazardous Substances

8.1.1 Initial Notification: The U.S. Environmental Protection Agency has established Reportable Quantities for hazardous substances released into the environment. The listing of Reportable Quantities (RQ) is published in 40 CFR 302, a copy of which is maintained by Environmental and Hazardous Materials Services, Dept. 464C. See Flow Charts, Pages 57 and 58, for required initial notifications. Boeing - St. Louis Environmental and Hazardous Materials Services will determine if a spill or release is reportable, and will provide the required external notifications.

8.1.2 Follow-Up Reports: A written follow-up report is not required to be submitted to the National Response Center. For permitted NPDES outfall spills, a follow-up report to Missouri Dept. of Natural Resources (DNR) is required. For non-NPDES spills to surface water, a follow-up report to Missouri Dept. of Natural Resources is required if requested by DNR.

### 8.2. Oil/Petroleum Spills into Navigable Waters

- 8.2.1 <u>Initial Notification:</u> Any spill which results in a visible sheen on a navigable waterway (such as Coldwater Creek) must be reported to the National Response Center and others. See Flow Charts, Pages 57 and 58, for required initial notifications.
- Follow-Up Reports: A written follow-up report is not required to be submitted to the National 8.2.2 Response Center. For permitted NPDES outfall spills, a follow-up report to Missouri Dept. of Natural Resources (DNR) is required. For non-NPDES spills to surface water, a follow-up report to Missouri Dept. of Natural Resources j required if requested by DNR. Under the SPCC provisions of the Clean Water Act, if a facility discharges more than 1,000 gallons of oil into or upon navigable waters in a single spill event, or "discharges oil in harmful quantities," such facility shall submit to the EPA Regional Administrator, within 60 days from time of incident, a complete report, giving full description of such incident and what corrective actions and countermeasures will be taken to minimize the possibility of recurrence.
- 8.3. Hazardous Waste Spills/Incidents in Permitted Drum

  Storage Areas or Above-ground Waste Tanks: Spills or incidents involving one of the permitted hazardous waste storage areas are subject to unique notification requirements of 40 CFR 264.56. If a hazardous waste is released (regardless of the RQ of the substance) in such manner or amount as to "threaten human health or the environment, outside the facility" it is reportable.

- 8.3.1 <u>Initial Notification:</u> This type of release must be reported immediately to the National Response Center and Missouri Dept. of Natural Resources. The release may trigger additional notifications, as described in the Flow Charts, Pages 57 and 58.
- Follow-Up Reports: In addition to any follow-up reports required under E 8.1.2 and E 8.2.2 above, there is a written report that must be submitted to the EPA Regional Administrator, Region VII and Missouri Dept. of Natural Resources within 15 days. See 40 CFR 264.56(j). The report must also be entered in the RCRA operating record in Dept. 464C files. Normal operations (incoming wastes) are suspended until such time that EPA and the State are notified that emergency equipment is cleaned and ready for use, and incompatible materials are removed.
- 8.4. Failure of Underground Hazardous Waste Tanks: Spills or incidents involving one of the permitted hazardous waste storage tanks are subject to unique reporting requirements of 40 CFR 264.196. The operator has 24 hours to remove the waste from the leaking tank or portion of the tank system.
  - 8.4.1 Initial Notification: Unless the release is less than 1 lb. and is immediately contained and cleaned up, the incident must be reported within 24 hours of discovery to the National Response Center or Regional Administrator, EPA Region VII Waste Mgt. Division, RCRA Permitting (913) 236-2888 and Missouri Dept. of Natural Resources. See Flow Charts (Pages 57 and 58) for NRC and DNR phones.
  - 8.4.2 Follow-Up Reporting: Within 30 days of detection of a release to the environment, a report must be submitted to EPA Region VII and Missouri Dept. of Natural Resources. See 40 CFR 264.196(d) for required contents.
- 8.5. Failure of Underground Petroleum Product Tanks:
  Suspected releases from petroleum product (fresh material) tanks must be reported within 24 hours.
  Under federal regulation, 40 CFR 280.50, the single point of contact for reporting is Missouri Dept. of Natural Resources.

- 8.5.1 <u>Initial Notification:</u> The following condition indicating a suspected release must be reported within 24 hours of discovery:
  - a. Positive sample or hydrocarbon alarm from adjacent exterior or interstitial monitoring point.
  - b. Unusual operating conditions such as erratic behavior of product dispensing equipment, sudden loss of product, unexplained presence of water, or liquid/vapors at the site which are of unknown origin.
  - c. Evidence of product liquid or vapors in nearby soils, basements, sewer and utility lines, or nearby surface water.
  - d. Indication from gas chromatography or equivalent method that there is a concentration of at least 100 ppm total hydrocarbons in a soil sample.

Tank failure need not be positively verified to trigger the initial notification requirement. Notification is directed to:

UST Coordinator Missouri Dept, of Natural Resources P.O. Box 176 Jefferson City, MO 65102 (573) 751-7929

- 8.5.2 Follow-Up Reporting. Suspected releases require an Boeing St. Louis release investigation and confirmation. A follow-up report to Missouri Dept. of Natural Resources is required in either case.
- 8.6. Polychlorinated Biphenyl (PCB) Spills: Spills or incidents involving PCB's areas are subject to unique notification requirements of 40 CFR 761.125, which are in addition to those imposed under the Clean Water Act or CERCLA Reportable Quantity notifications.
  - 8.6.1 Initial Notification. See Flow Charts, Pages 57 and 58.

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- 8.6.2 Follow-Up Reports. In addition to reports required in E 8.1.1 above, the EPA Regional office may require written descriptions and certification of decontamination. Cleanup documentation must be retained in Boeing St. Louis files for a period of 5 years. The scope of this documentation is found in 40 CFR 761.125.
- 8.7. Off-Site Releases of "Extremely Hazardous Substances":
  The EPA list of "Extremely Hazardous Substances" and associated Reportable Quantities is found in 40 CFR 355. Any release of an Extremely Hazardous Substance which is greater than a Reportable Quantity and involves a risk of exposure beyond Boeing St. Louis plant boundaries is subject to notification under the Superfund Amendment and Reauthorization Act (SARA). This SARA notification is in addition to any notifications required under E 8.1.1 and E 8.1.2 above.
  - 8.7.1 Initial Notification. See Flow Charts, Pages 57 and 58. The following items shall be included to the extent known at the time of the incident and so long as no delay in notice or emergency response results.
    - a. The chemical name or identity of any substance involved in the release.
    - b. An indication that the substance is an "extremely hazardous substance".
    - c. An estimate of the quantity of any such substance that was released into the environment.
    - d. The time and duration of the release.
    - e. The medium or media into which the release occurred.
    - f. Any known or anticipated acute or chronic health risks associated with the emergency and, where appropriate, advise regarding medical attention for exposed individuals (recommend coordination with Dept. 064C).

- g. Proper precautions to take as a result of the release, including evacuation.
- h. The names and telephone number of the person or persons to be contacted for further information.
- 8.7.2 Follow-Up Reporting. As soon as practicable after the release, the local emergency planning committee shall be provided written emergency notice(s) setting forth and updating the information above, and including additional information on:
  - a. Actions taken to respond to and contain the release.
  - b. Any known or anticipated acute or chronic health risks associated with the release.
  - c. If appropriate, advice regarding medical attention necessary for exposed individuals.
- 8.8 Other Releases to Sanitary Sewers: Some releases to sanitary sewers are not covered by one of the previous notification requirements, but can exceed Industrial User Permit limits set in Metropolitan Sewer District (MSD) effluent discharge permit or Ordnance No. 4786.
  - 8.8.1 Follow-Up Reports Within 5 working days following an accidental discharge, Boeing St. Louis Environmental and Hazardous Materials Services shall submit a detailed written report to MSD describing the cause of the discharge and the measures to be taken by Boeing St. Louis to prevent similar future occurrences.
- 8.9 Other Releases to Storm Sewer outfalls: are not covered by one of the previous notification requirements, but may exceed a permit limit for one of the storm sewer outfalls permitted under the National Pollutant Discharge Elimination System (NPDES). These outfalls are permitted only for non-contact cooling water and stormwater runoff, so known releases of other material s or exceeding the numerical limits is sufficient to require reporting.
  - 8.9.1 Initial Notification. See Flow Charts, Pages 57 and 58.

8.9.2 Follow-Up Reporting. A written report must be submitted within 5 days of discovery. See Boeing - St. Louis's NPDES permit conditions for required content.

### F. INCIDENT MITIGATION AND CLEAN-UP:

### 1. FLOODING OR NATURAL DISASTER

Hazardous waste storage tanks and containerized storage areas are above the 100 year flood plain of Coldwater Creek (40 CFR 264.18). High water in Coldwater Creek can, in extreme situations, lead to localized flooding in the sanitary sewage trunk line at Bldg. 14. This condition does not pose a significant risk of hazardous material release from flooding. Natural disasters such as tornado and earthquake are more likely to involve multiple hazardous material incidents. Emergency Plan 1 describes the procedure for identifying, isolating, and mitigating multiple hazardous material incidents in the context of a plantwide emergency.

### 2. FIRE AND/OR EXPLOSION

Hazardous waste storage tanks, hazardous waste 2.1 container storage shelters, hazardous product tanks and large-quantity storage areas for product containers can be easily accessed by firefighting and other emergency vehicles and equipment. Boeing - St. Louis has a "Pre-Fire Plan" for each building/facility that contains information on what is stored, where fire hydrants/other fire equipment are located, what action is to be taken by firemen and quards in the event of a fire, and what backup community fire departments are to be called. Boeing - St. Louis has its own Fire Services, which consists of a minimum of four firemen and one officer on duty at all times. The Fire Service force is larger during shifts when plant activity is at a maximum. Boeing - St. Louis Fire Services are equipped with protective gear for entering and working in toxic atmospheres. These are described in Section As first responders to chemical incidents, the Boeing - St. Louis Fire Department is required to have initial and refresher training under 29 CFR 1910.120 OSHA Hazardous Waste Operations and Emergency Response.

2.2 Boeing - St. Louis Fire Services are designated first responders in all cases where there is risk of fire or explosion. Fire Services maintains control of response activities until such time as the fire/explosion hazard is under control. Flushing with large quantities of water or foaming of fuel/chemical spillage will be performed only if instructed by a Fire Services officer. The Fire Services officer will determine when the fire/explosion hazard is under control and turn the incident over to Boeing - St. Louis Environmental and Hazardous Materials Services for mitigation and cleanup of any residual environmental hazard.

### 3. SPILLS OR MATERIAL RELEASE

3.1 In-House or Contractor Response: During the hazard assessment phase described in Section E 5, Boeing - St. Louis Environmental and Hazardous Materials Services will determine whether the severity of the incident warrants a response by outside spill cleanup contractor or by in-house maintenance crews. Generally, spill cleanup contractors will be called in on incidents which require Level A protective equipment for entry, and on incidents which require use of Level A or B equipment over an extended period of time for cleanup. Many incidents which require Level C or D equipment can be treated by Boeing - St. Louis maintenance personnel, if equipment is available and the incident does not require the extensive training required under OSHA regulation 29 CFR 1910.

Boeing - St. Louis Environmental and Hazardous Materials Services is responsible for maintaining a response contract with outside spill response contractors. These contractors must be capable of responding in a short time with adequate equipment, and must document their ongoing training program to meet OSHA regulation 29 CFR 1910.120.

- 3.2 On-Site Spill Containment/Clean-up: Significant fixed storage facilities are equipped with structural spill containment. Cleanup of these areas will consist of pumping captured liquids into compatible containers, or absorbing or sweeping spilled materials within the containment area. Spills may occur outside these sites, however, especially during transportation of materials. For these incidents, timely containment and cleanup will prevent the spread of contaminants to a larger area. In either case, cleanup personnel will:
  - 3.2.1 Make sure all persons not required stay clear of the hazard area.
  - 3.2.2 Determine the major components in the material at the time of the spill.
  - 3.2.3 Wear appropriate protective equipment.
  - 3.2.4 If flammable material is involved, remove all ignition sources, and use spark and explosion proof equipment and clothing in containment and cleanup.
  - 3.2.5 Obtain a confined space entry permit if needed;
  - 3.2.6 Remove all surrounding materials that could react with the hazardous material.
  - 3.2.7 For acid spills, use a neutralizing agent to reduce the corrosive hazard.
  - 3.2.8 Use absorbent pads, booms, earth, sandbags, sand, and other inert materials to contain, divert, and clean up a spill if it has not been contained by a dike or sump. Most spills contained within a dike or sump can be pumped into an appropriate storage tank or drum.
  - 3.2.9 If the spill reaches a storm sewer, try to dam the inlet using sand, earth, sandbags, etc. If this is done, pump this material into a temporary holding tank or drums as soon as possible. If a spill enters the creek or has entered a storm drain, use absorbent booms and sweeps around the outfall to contain and absorb water-insoluble organics. See Section F 3.4 below for more details.

- 3.2.10 Place all containment and cleanup materials in drums or portable tanks for proper disposal.
- Releases to Industrial Sewers: For spills into industrial sewers, the Bldg. 14 wastewater pretreatment plant operators will monitor the operation of neutralizing equipment (acid, caustic, and ferrous chloride), deploy absorbent materials in the settling tanks (floating hydrocarbons), recirculate effluent for additional treatment, or take other action to prevent discharge of harmful substances into sanitary sewers.
- Releases into Surface Drains or Storm Sewers: For minor releases that occur during dry weather, full or partial recovery of spilled material is possible at the manhole or drainage swale where the spill occurred. Failing that, there are intermediate manholes on the flight ramp and the Bldg. 2 parking lot where some recovery is possible, prior to entry into Coldwater Creek. Absorbent socks or contractor vacuum truck will be deployed at these locations by Environmental and Hazardous Materials Services staff, if recovery is possible by these means.

For releases of oils, fuels, nonhalogenated solvents, and other floating hydrocarbons which have already reached or will inevitable reach a storm sewer outfall, the following site-specific procedures will be followed.

### 3.4.1 Tract I North

- (a) Outfall Location: Spills into any storm sewer drainage system in Tract I North will flow to NPDES Outfall 001. This outfall is located on the north side of McDonnell Boulevard, across from the Bldg. 27 parking lot. The effluent comes from under McDonnell Boulevard.
- (b) Action: Environmental and Hazardous Materials Services will, immediately after being notified of oil entering the storm sewers in Tract I North, take the following steps:

- (1) Send personnel to the absorbent storage container located in the Bldg. 27 parking lot southeast of NPDES Outfall 001.
- (2) Move absorbing media from the storage container to NPDES Outfall 001.
- (3) Install absorbing media across the entire width of the flowing stream, allowing the media to float on the water surface.
- (4) If this action does not contain the spill or if some spillage has already passed this point, then obtain the "Oil Spill Response Trailer" located at Bldg. 14. This trailer must then be towed to a downstream location, as described in 4.4 below.

### 3.4.2 Tract I South

- (a) Outfall Location. Spills into storm sewers in Tract I South will flow to NPDES Outfalls 002/004 and 003. Partial flows in high stormwater situations will be diverted from the wet well pumphouse at Bldg. 2 directly to Coldwater Creek. Outfall 002/004 enters Coldwater Creek in an underground conduit. Access to Outfall 003 is gained by entering the doors on the north side of Bldg. 9 pump house. Outfall 003 is the outlet of the stream flowing through the basement of Bldg. 9.
- (b) Action: Environmental and Hazardous
   Materials Services will, immediately when
   notified of a spill entering the storm
   sewers in Tract I South, take the
   following steps:
  - (1) Send personnel to the "Emergency Oil Absorbing Media" storage box located in the southeast corner of Bldg. 9 and install one (1) 10-foot boom across at this location.

- (2) Remove the remaining oil-absorbing booms from Bldg. 9 or the storage container identified as "Emergency Oil Absorbing Boom" located in Parking Lot 3. Install in Coldwater Creek immediately north of Banshee Road. The boom must float on the water surface and reach the width of the flowing water.
- (3) If Step 2 does not contain the oil, then go to the storage container in Bldg. 27 parking lot labeled "Emergency Oil Absorbing Boom". Install the boom(s) in Coldwater Creek immediately south of McDonnell Boulevard.
- (4) If Step 3 does not contain the oil, then go to Bldg. 14, obtain the Oil Spill Response Trailer, and tow the trailer to a downstream location, as described in 3.4.4 below.

### 3.4.2 Tract II

- (a) Outfall Location Spills into any storm sewer in Tract II will flow to NPDES Outfalls 006, 007, or 010. All of these outfalls ultimately discharge into a tributary of Coldwater Creek which flows north, parallel to Eva Avenue.
- (b) Action: Environmental and Hazardous Materials Services will, immediately when notified of a spill entering the storm sewer in Tract II, take the following steps:
  - (1) Send personnel to Bldg. 14, obtain the Oil Spill Response Trailer, and tow the trailer to Tract II.
  - (2) Determine at which NPDES Outfall the discharge is occurring and take the Oil Spill Response Trailer there.

- (3) Install absorbent or boom to prevent escape from Boeing - St. Louis property.
- (4) If the discharge is already past these NPDES Outfalls, then proceed with the Oil Spill Response Trailer to a downstream location as described in 3.4.4 below.

### 3.4.4 Spill Recovery at Downstream Locations

- (a) If it has been LESS than two hours since the discharge at the Boeing St. Louis outfall, take the Oil Spill Response Trailer to the railroad trestle over Coldwater Creek northeast of the intersection of Eva Avenue and Frost Avenue. Install the boom(s) and begin recovery using floating skimmer or absorbents in Coldwater Creek. For Tract II spills, place recovery materials in the ditch immediately east of Eva Avenue.
- (b) If it has been MORE than two hours since the discharge at the Boeing St. Louis outfall, take the Oil Spill Response Trailer to the intersection of Coldwater Creek and Highway I-270 south service road (9000 Pershall Road). Install the boom(s) and begin recovery, Under baseline flow (dry weather) conditions, a discharge from Tract I will require at least 6 hours to reach Coldwater Creek and Pershall Road. Discharges from Tract II will require at least 7 hours.
- 3.4.5 Surface Spills at Other Locations. Relatively minor amounts of oils, fuels, and chemicals are used or stored at locations other than Tracts I and II. However, if surface spillage occurs at another location, the on-scene coordinator will utilize cleanup materials in Boeing St. Louis Fire Services response vehicles, the Environmental and Hazardous Materials Services response vehicle, the Bldg. 14 oil response trailer, or cleanup materials staged at the remote location.

3.4.6 Spills into Soil. Most of the areas where oils, fuels, and chemicals are used or stored are either indoors or on pavement. Exceptions are some electrical substations and drainage ditches along public roadways that serve the plant. If an oil or hazardous material comes into contact with soil, maintenance personnel or cleanup contractors will remove contaminated soil and handle as hazardous or special waste. removal is not adequate, soil venting, bioremediation, or groundwater cleanup must be pursued. This work will be directed by Boeing -St. Louis Environmental and Hazardous Materials Services, in concert with state and federal regulatory agencies.

# 4. PREVENTION OF RECURRENCE OR SPREAD OF FIRES, EXPLOSIONS, OR RELEASES (40 CFR 264.56 (E)):

Actions to prevent the recurrence or spread of fires, explosions, or releases include stopping processes and operations, collecting and containing released waste, and recovering or isolating containers. If the facility stops operations in response to an emergency, the Emergency Coordinator will monitor valves, pipes, and other equipment for leaks, pressure buildup, gas generation, or ruptures.

### 5. STORAGE AND TREATMENT OF RELEASED MATERIAL (CFR 264.56 (G)):

Immediately after an emergency, the Boeing - St. Louis Environmental and Hazardous Materials Services will make arrangements for treatment, storage, or disposal of recovered waste, contaminated soil, surface water, or any other contaminated material. Where cleanup is done by remedial contractor, Environmental and Hazardous Materials Services staff shall review and approve all treatment, storage, and disposal methods.

### 6. INCOMPATIBLE WASTES (40 CFR 264.56 (h) (2)):

For incidents involving a Boeing - St. Louis hazardous waste storage area, Environmental and Hazardous Materials Services will ensure that no hazardous wastes which may be incompatible with the released material are stored there until cleanup procedures are completed.

## 7. POST-EMERGENCY EQUIPMENT MAINTENANCE (40 CFR 264.56 (h)(2)):

After an emergency event, all emergency equipment will be cleaned so that it is acceptable for use or it will be replaced. See Section IV for decontamination procedures. For permitted hazardous waste storage areas, Environmental and Hazardous Materials Services must notify EPA Region VII and Missouri Dept. of Natural Resources that emergency equipment is operational before resuming normal operations in the affected area of the facility.

### G. DECONTAMINATION PROCEDURES FOR EQUIPMENT AND PROTECTIVE GEAR:

### 1. DECONTAMINATION REQUIREMENTS

For spills of toxic, corrosive, or environmentally persistent chemicals, a formal decontamination procedure is needed to prevent the spread of contaminants from the incident site to clean areas. Careless decontamination can result in tracking of contaminants on rubber tires or footwear, or in secondary exposure from contaminated respirators or protective gear.

Disposable protective equipment is helpful in reducing the risk of secondary exposure and is recommended so long as it offers adequate protection. Disposable equipment is no substitute, however, for proper site control and decontamination procedures.

### 2. DECONTAMINATION DURING MEDICAL EMERGENCIES

Depending upon the hazard of the chemical involved and the severity of injury, patient decontamination may be required prior to transporting injured parties to a medical facility.

2.1 Corrosives: Emergency eyewashes and showers are strategically located in areas where strong corrosives are used or stored. They are checked weekly to ensure proper functioning by using departments. They are of value in reducing the severity of corrosive burns, both to the patient and persons who assist the injured. If the corrosive burn is the primary injury, the victim should be rinsed as directed by an Emergency Medical Technician at the site prior to transportation.

- Non-Corrosive Chemicals: Some non-corrosive chemicals, such as PCB's and chlorinated solvents, do not evaporate readily and will contaminate stretchers, ambulances, first aid stations, and a hospital emergency room if not removed or contained. In cases where the injury allows time for removal of outer protective equipment or contaminated garments, they should be removed and left at the incident site. In case of severe injury, contamination can be controlled by wrapping the patient in plastic, rubber, or blankets to help prevent contamination of ambulances and medical personnel. In these cases, on-scene response personnel should brief on-scene medical personnel on the hazard posed by the chemical or accompany the contaminated victims to the medical facility.
- 2.3 <u>Heat Stress:</u> Use of chemical protective equipment can contribute to heat-related illness. If the protective equipment is contaminated, it should be removed during initial first aid, and left at the contamination site.

### 3. SITE CONTROL AND WORK ZONES

Translocation of contaminants can be reduced or eliminated in a number of ways:

- 3.1 Set up security and physical barriers to exclude nonresponse personnel from the general area.
- 3.2 Minimize the number of personnel and equipment on site, consistent with safe operation.
- 3.3 Establish work zones at the site. For incidents where decontamination will be necessary, an Exclusion Zone, a Contamination Reduction Zone, and a Support Zone will provide the necessary control:
  - 3.3.1 Exclusion Zone. This is the zone where contamination of equipment or personnel does or could occur. All persons in this zone must be equipped with protective equipment appropriate to the hazard level.
  - 3.3.2 Contamination Reduction Zone. Outside the Exclusion Zone is a buffer zone, where decontamination takes place. Typically, one or two decontamination corridors are set up, and access through the zone is limited to these control points.

- 3.3.3 Support Zone. Outside the Contamination Reduction Zone is the uncontaminated Support Zone. Support equipment and command post are located in this zone, and traffic is restricted to authorized response personnel.
- 3.4 Establish control points in a manner to regulate access to work zones.
- 3.5 Conduct operations in a manner that reduces the exposure to personnel and equipment and eliminate the potential for airborne dispersion. There are detailed protocols for establishment and use of work zones. Boeing St. Louis first responders shall, under Emergency Plan 8, obtain in-depth training in site control and decontamination. See References page 3, C9.

### 4. DECONTAMINATION IN NON-MEDICAL EMERGENCIES

The initial decontamination plan assumes all personnel and equipment leaving the Exclusion Zone are grossly contaminated. A system is established for personnel decontamination of all the protective equipment used. This is done with a sequential doffing of protective equipment, starting at the first station with the most heavily contaminated item and progressing to the last station with the least contaminated article. If disposable garments are worn, decontamination can be omitted, but a sequential doffing of equipment is critical, and contaminated gear must be collected before leaving the decontamination zone.

The original decontamination plan must be flexible, depending on the type of containment, amount of contamination, level of protection (Level A, B, or C), type of work performed by the worker in the Exclusion Zone, location of contamination on the body, and reason for leaving the Exclusion Zone.

Boeing - St. Louis first responders are required, under Emergency Plan 8 and 29 CFR 1910.120, to receive training, detailed procedures, and field practice in decontamination.

### G. AVAILABLE RESOURCES FOR HAZARDOUS INCIDENT/OIL SPILL RESPONSE:

### 1. FIRE SERVICES

Boeing - St. Louis Fire Services, is staffed with a minimum of 6 firemen and 1 officer on duty at all times. Fire Services equipment consists of: three Class A structural pumpers; two crash trucks with 2,000 gallons of water and 210 gallons of foam; one truck with 1,000 pounds of dry chemicals.; one truck with 500 lbs. of Halon, one utility van; one car; three pickup trucks; a trailer with 20 bags of oil-absorbent material; and a Hazardous Material response trailer. Boeing - St. Louis has a "Pre-Fire Plan" that describes what is stored at each building, where fire hydrants are located, what action is to be taken by firemen and guards in the event of a fire, and what backup community fire departments are to be called.

### 2. SECURITY/PLANT PROTECTION

Boeing - St. Louis has a security guard service of more than two hundred people, providing 24 hour security service. The guards are licensed as Armed Security Officers by the St. Louis County Police Department and the St. Charles County Police and have the authority to make arrests. The security guards and firemen constitute the local authoritie in incidents on Boeing - St. Louis properties.

### 3. Boeing - St. Louis MEDICAL FACILITIES

Boeing - St. Louis facilities are serviced by 3 first aid stations and a central medical care unit staffed by 12 nurses. In addition, an on-site Emergency Medical Response Mobile Unit, staffed with a paramedic and emergency medical technician (EMT), is provided twenty-four hours per day, seven days a week. Macon Medical Center provides physician coverage at the plant site on the day and evening shifts five days per week. The physicians are on 24 hour call, seven days a week. The hazardous materials used at the plant are covered by Material Safety Data Sheets available in work sites via an electronic database and from Boeing -St. Louis Occupational Safety and Environmental. If it is necessary to transport an injured employee to the hospital, a Macon Medical Center physician is contacted for instructions and the hospital is notified of the type of injury or exposure. The physicians and nurses are aware of the hazardous materials in their areas and can assist the hospitals.

#### 4. HOSPITALS

For emergencies requiring hospitalization, Boeing - St. Louis uses services provided by Christian Northwest, Deaconess Hospitals and St. Joseph Health Center for "nonburn" emergencies and St. John's Mercy Hospital for "burn" emergencies.

#### 5. SPILL RESPONSE/ENVIRONMENTAL CLEANUP CONTRACTORS

Boeing - St. Louis Environmental and Hazardous Materials Services maintains ongoing emergency service contracts with outside firms which specialize in hazardous spill response and cleanup. St. Louis is a highly competitive market for spill response contractors, and there are several fullservice contractors who are able to respond rapidly with crews and equipment. In order to be eligible to perform this type of work, the contractor must demonstrate an ability to respond to the St. Louis site in timely manner with adequate equipment and personnel. The contractor must also demonstrate compliance with OSHA regulations and training requirements in 29 CFR 1910.

#### 6. MAINTENANCE PERSONNEL

In-house maintenance personnel who perform certain specialized routine tasks, such as chemical transfer and process tank cleaning, are trained in use of respirators and chemical protective equipment. When the release requires cleanup beyond initial response, Fire Services will turn command of the incident over to Environmental and Hazardous Materials Services. Environmental and Hazardous Materials Services will use environmental contractors (H 5. above) and/or in-house maintenance personnel as appropriate. the cleanup requires use of Level A or B protective equipment over an extended period of time, or specialized environmental training, maintenance crews will not be used.

#### 7. EQUIPMENT LISTS FOR OIL/HAZARDOUS\_MATERIAL INCIDENT RESPONSE

Bldg. 27 Parking Lot Spill Containment Equipment In parking lot 27, near the McDonnell Blvd. bridge over Coldwater Creek, is a container marked "Emergency Oil Absorbing Boom". It contains:

50' of rope

Three oil-absorbing booms 8" dia. X 10' long each 10 oil-absorbing pads

7.2 Bldg. 9 Spill Containment Equipment
Outside Building 9 at the southeast corner, ground
level, is a metal box labeled "Emergency Oil
Absorbents". It contains:

One bale of 100 absorbent pads
2 oil absorbent booms, 8" dia. X 10' long each
50 feet of rope One bucket
One janitorial mop wringer One box of trash bags

7.3 Oil Spill Response Trailer
A trailer marked "Oil Response Trailer" is parked at
Bldg. 14 wastewater pretreatment plant. This trailer
requires an automobile or truck equipped with a balltype hitch and light hook-ups to move to the work site.
The trailer contains:

One mop bucket One oil skimmer One mop wringer Two 55 gallon open-top drums Two pair of hip boots Two full-face shields Four pairs of rubber gloves One box of Tyvek suits One hammer One spool of rope 2 discharge hoses, 100' each One box trash bags Acid resistant mini boom, 50' X 4" Standard containment boom, 50' X 4" Two pair of knee-length boots One bale of 100 absorbent pads Four oil absorbent booms, 8" diameter by 10' long each

7.4 Bldg. 101 Parking Lost Spill Containment Equipment
In parking lot 101, near the salt pile, is a container
marked "Emergency Oil Absorbing Boom". It contains

50' of rope Two oil absorbing booms 8" dia. X 10' long each 10 oil absorbing pads

7.5 Bldg. 598 WWTP Spill Containment Equipment
In the treatment plant is a spill kit in a small blue over-pack. It contains:

One Spill Mat
One Small Containment Pool
Bag for Waste Collection

Absorbent Socks
Pads

-REV-

-NEW-

-NEW-

7.6 Fire Services Emergency Response Vehicle (Unit #7999)
This vehicle is parked at the Bldg. 2 Fire Station. It is equiped with both radio and cellular telephone. The equipment inventory includes:

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2 - 1 hour Scott Air Packs
                                      2 - 1 hour Scott Air Bottle Spare
 6 - 30 min Scott Air Bot Spare 2 - 30 min Scott Air Packs
1 - Black Plastic Salvage Cover 1 - Tripod
 6 - 30 min Scott Air Bot Spare
 1 - Aluminum Bench
                                       1 - Face Shield
 1 - Skid Strecher
                                      1 - Stokes Strecher
                                      1 - Back Board
 1 - Oregeon Spine Splint
 8 - Broom Handles
1 - 5 lb. CO2 Fire Extinguisher 1 - Box #8710 Respriators
 1 - Roll Avis Strap
                                      5 - Rolls Duct Tape
 3 - Set of Knee Pads
                                      3 - Dux Seal
3 - Set of Knee Pads 3 - Dux Seal
2 - Rolls Banner Tape 10 - Environmental Vests
1 - Tube PIG Repair Putty 2 - Boxes Latex Gloves
1 - Bucket of Soda Ash 1 - Ball of string
1 - Bucket of Soda Ash
3 - Rolls of Plastic Sheets
2 - Bags of Absorbment
1 - Bucket of G-1 Powder
1 - Set of Heavy Duty Latex Gloves
5 - Bags of #356 Blue Rubber Gloves
1 - Bag of Class A Green Rubber Gloves
4 - Level A Haz Mat Suits in bags8 - C-103 Haz Mat Suits
6 - Tyvek Suits 3 - Green Splash Suits
3 - White 1 piece Vapor Barrier Suits
1 - Generator
                                      2 - Hand Held or Stand Spot Lights
1 - 5 Gallon Gas Can
1 - Set Booster Cables
                                      2 - 100 ft reels of Extension Cords
                                      1 - White Flood Light
1 - 50 ft Reel Extension Cord 1 - Black Flood Light (Hand Held)
1 - Funnel
1 - Yellow Bag of Elect. Connectore Adaptors
2 - Smoke Ejectors & Expandable Hanger Bars
2 - Helmets
                                      4 - Roco Individual Kits
1 - Box of Rescue Equipment 2 - Tripod Winche Systems 6 - Roco Harness (Green Bag) 4 - Rescue Rope Bags w/rope (600 ft.)
2 - 10 lb Sledge Hammer
                                      1 - 5 lb. Sledge Hammer
2 - Sets of Large Bolt Cutters 1 - Large Pipe Wrench
2 - Medium Pipe Wrenches
1 - Tools Box w/Tools
                                      1 - Cheater Bar
1 - Tools Box w/Tools
                                      3 - Scoop Shovels
1 - Broom Head
                                      2 - Lid Lefters
1 - Fire Axe
                                      2 - Hydrant Wrenches
                                      2 - Large Crescent Wrenches
1 - Small Pipe
1 - Bung Tool
                                     1 - PIV Wrench
                                     1 - Kiddie Pool
5 - Spanner Wrenches
1 - Blue Salvage Coveer
                                    1 - Box Plastic Bags
5 - OS&Y Wrenches
                                     1 - Tile Lifter
                                   1 - Short Squeege Handle
5 - Broom Heads
1 - Crow Bar
1 - Halligon Tool
6 - Squeege Heads
1 - Gas Driven Rescue Saw
                                     1 - Hammer
                               1 - Manumer
1 - Wood Cribbing
1 - Chlorine Cylin
2 - Electric Skill Saws
1 - Box of Wood Plugs
                                     1 - Chlorine Cylinder Plug Kit
1 - Cribbing Sections
                                    1 - Hydraulic Port-a-Power
2 - Warm Zone Signs
2 - Hot Zone Signs
2 - Decon Zone Signs
                                    1 - A Kit (Haz Mat)
1 - Gallon Fuel Gas Container (2 cycle)
1 - A-2 Kit (Haz Mat)
1- Oil Spill Extinguisher 1 - Attic Ladder 1 - Bag of Skim Response Pads 2 - Blue Salvage Covers
1 - Roll of Spill Tape
                                    11 - Boxes of Confo II Facepieces
                                   1 - Camera Kit
4 - Disposable Blankets
1 - First Aid Kit
                                    1 - Electronic Stethoscope
                                   10 - Traffic Cones
5 - Pair of Boots for Chem Suits
1 - Roll Cheesecloth
1 - Buffalo Wrench
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1 - Supplied Air Valve/Regulator
3 - Pair of Bunker Boots
1 - Roll Duct Tape
                                       1 - Bottle of Soap
                                      2 - Hand Lanterns
2 - Folding Saw Horses
                                      1 - Decon Shower
2 - Haz Mat Pools
1 - Radiation Detector Set
                                       6 - Micro Shields
1 - Box Powderless Latex Gloves 4 - Pair of goggles
1 - Set of Wheel Chockes 4 - Bx of Chem Respirator Cartridges
2 - Decon Sprayers w/Soap 1 - Roll of Plastic
                                      1 - Light Stand
1 - Bundle of Towels
                                     1 - Mobile Telephone
1 - Decon Brush
3 - Portable Radio Chargers 1 - Command Post Sign
1 - Fire Incident Pad 1 - Set of Ear Muffs
1 - LEL Meter 1 - Set of Haz Mat Reference Materials
1 - LEL Meter
1 - PCB Screening Kit 1 - Group of Stationary Supplies
1 - Scott Air Mask 1 - Piar of Binoculars
1 - Roll of Acid Tape
                                      1 - Box of Latex Gloves
1 - Hand Lantern
1 - Box of pH Strips
                                       1 - Sealing Tool
1 - Roll of Wire (Valve Sealing) 1 - Pair of Rubber Gloves
1 - Sprinkler Plugging Tool 1 - Halogen Bulb
1 - 25 ft Extension Cord
                                       1 - Telephone Instructions
                                       1 - Set of Elevator Keys
1 - Garage Door Opener
1 - Haz Mat Response Guide Book
                                       1 - Roco Adjustable Utility Belt
1 - Team Member Bag
                                       1 - PMI Accessory Cord (14 ft Section)
1 - Helmet w/Headlight & Neck Strap
1 - Rappel Rack
1 - Set of Gloves 1 - 24 ft - 1 inch Nylon Tubular Webbing
5 - SMC Large Locking D Carabineres (except for Team Leader 3)
10 - SMC 4" Pulley
                                       2 - Shock Absorbers
                                       1 - Wrislet Kit
3 - SMC 2" Pulley
3 - SMC 2" Pulley
3 - Gibbs Acsenders ½" Steel
7 - Roco Rope Pads
                                     1 - Line Transfer System
1 - Tri Screw Line
10 - Roco Utility Belt
                                       4 - Extra Large Carabiners
                                       1 - 4 to 1 Mechanical Advantage System
 4 - SMC Figure * w/Ears
 1 - Rose Extraction Harness w/Lift Bar
 8 - Sections Tubular Webbing (var lengths)
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# 8. Environmental and Hazardous Materials Services Emergency Response Vehicle:

This vehicle is used for a variety of environmental functions, but is equipped for and designated for emergency response. This vehicle contains:

Bung wrench
Spill-dry adsorbent
One manhole hook
Disposable plastic bags
Sampling equipment, pH paper

Oil absorbing pads Two oil absorbing booms Soda Ash Protective suits, boots, and gloves

# 9. Equipment and Materials for Spill Containment and Cleanup at Other Plant Locations.

Drums, fifty-five (55) gallon, with polyethylene liners (DOT 37M). Bldg. 27 and 101 hazardous waste shelters.

Drums, fifty-five (55) gallon, mild steel (DOT 17E and 17H). Bldg. 27 and 101 hazardous waste shelters.

Carboys, five (5) gallon, polyethylene, new, with cardboard carton (DOT) 2U carboy and DOT 12P carton). Bldg. 27 and 101 hazardous waste shelters.

Recovery (salvage) drums, 85 gallon. Bldg. 27 hazardous waste shelter.

Pumps, transfer, portable acid resistant. Maintenance shops, Tract I, II, and IV.

Wrenches, Bung. Bldg. 27 and 101 hazardous waste shelters, maintenance and production shops.

Caddy-Drum for fifty-five (55) gallon drum. Bldg. 27 and 101 hazardous waste shelters, maintenance shops..

Soda Ash, commercial grade (Material code No. 183-32180-100 lb. bags). Bldg. 27 and 101 hazardous waste shelters, Bldg. 39 Dope House.

Oil-absorbent compound (Material code No. 185-31516-50 lb bags).Bldg. 27 and 101 hazardous waste shelters, Bldg. 39 Dope House.

### -REV- 10. Emergency Chemical Transfer Kit:

Consists of mobile cart with acid pump, hoses, hand tools, hose fittings, barricade tape, personal protective equipment, etc. See SFP 70-12 Bldgs. 14, 29A, 27, 52, 101, and 220.

### 11. Personal Protective Equipment:

Disposable Chemical Resistant Suits/Chemical goggles and face shields/boots, gloves, cartridge respirators and cartridges, chemical resistant aprons, air line respirator equipment Tool cribs in all Tracts. (See Boeing - St. Louis Personal Protective Devices Manual)

Approved by:

Bryan Kury

Manager, Environmental and Hazardous Materials Services

Approved by:

Mike Dwyer

Director, Occupational Safety, Health and Environmental

Compliance

Approved by:

G. J. Olsen

Division Director - General Services

Reviewed by:

John P. Willems, Jr., PE

Registered Professional Engineer Missouri Registration #E-22852

WILLEMS JR.
NUMBER
E-22852

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F-22852

JOHN PAUL

### EMERGENCY COORDINATORS -- RCRA CONTINGENCY PLAN

Regulations governing the hazardous waste storage facilities require that an Emergency Coordinator and Alternates be identified by name. The following persons have primary responsibility for incidents involving hazardous waste storage facilities, and should be contacted internally via "911" in case of emergencies or at office telephone/pager numbers for routine work. "Off duty" phone numbers are provided for use by external regulatory authorities.

### Primary RCRA Emergency Coordinator

Elmer Dwyer: (314) 232-3319 (0630-1500 M-F), (314) 940-0522 (off duty)

Dept. 464C, Environmental and Hazardous Materials Services In house personnel use pager 8-235-8498 External personnel use pager 9-841-3879

Alternate RCRA Emergency Coordinator

### Second Alternate

-REV-Bryan Kury: 232-3319 (0730-1600 M-F), (314) 240-4317 (off duty) D464C/110/S111-1099

Building	Location	Material	Capacity	Leak Detection	Secondary Containment	Spill Route
2	2-2 AST TANK	ANHYDROUS AMMONIA	1000 GAL	ODOR-MED OCCUPANCY	NONE	VAPORIZATION
2	2-3 AST TANK	DIESEL FUEL	275 GAL	VISUAL-LOW OCCUPANCY	NONE	CONCRETE FLOOR, THEN SANITARY SEWER
2	DRUM SHELTER	WASTE SOLVENTS, OILS CORROSIVES	E per	VISUAL-HI OCCUPANCY	DIVIDED CONTAINMENT	CONTAINMENT
5	5-5 AST TANK	WASTE OIL FROM SEPARATOR	375 GAL	HIGH LEVEL ALARM	ASPHALT BERM	CONTAINMENT
5	5-6 AST TANK	FUEL OIL	375 GAL	VISUAL-LOW OCCUPANCY	NONE	CONCRETE FLOOR, THEN SOIL OR SEWER
5	A-5 UST TANK	#2 FUEL OIL	20000 GAL	INTERSTITIAL MONITOR	DOUBLE WALL TANK	CONTAINMENT
5	B-5 UST TANK	#2 FUEL OIL	20000 GAL	INTERSTITIAL MONITOR	DOUBLE WALL TANK	CONTAINMENT
5	EAST OF BOILER HOUSE	PCB TRANSFORMER	385 GAL	QUARTERLY INSPEC & HI OCCUPANCY	PAVED AREA ONLY	INDUST. SEWER
8	SUB-STATION 8	PCB CONTAM. TRANSFORMER	760 GAL	QUARTERLY INSPEC	NONE	CONCRETE PAD, THEN SOIL
8	SUB-STATION 8	PCB CONTAM. TRANSFORMER	7100 GAL	QUARTERLY INSPEC	NONE	CONCRETE PAD, THEN SOIL
8	SUB-STATION 8	PCB CONTAM. TRANSFORMER	847 GAL	QUARTERLY INSPEC	NONE	CONCRETE PAD, THEN SOIL
8	SUB-STATION 8	PCB CONTAM. TRANSFORMER	1060 GAL	QUARTERLY INSPEC	NONE	CONCRETE PAD, THEN SOIL
8	SUB-STATION 8 5 Small Transformers	PCB CONTAM. TRANSFORMER	300 GAL	QUARTERLY INSPEC	NONE	CONCRETE PAD, THEN SOIL
14	14-1 AST TANK	SULFURIC ACID (70%)	1200 GAL	DAILY OPERATOR INSPECTION	CONCRETE CURB	INDUST. SEWER
14	14-2 AST TANK	SODIUM HYDROXIDE (50%)	4200 GAL	DAILY OPERATOR INSPECTION	CONCRETE CURB	INDUST. SEWER

Building	Location	Material	Capacity	Leak Detection	Secondary Containment	Spill Route
14	14-3 AST TANK	SULFURIC ACID (70%)	1200 GAL	DAILY OPERATOR INSPECTION	CONCRETE CURB	INDUST. SEWER
14	14-4 AST TANK	FERROUS CHLORIDE	2000 GAL	DAILY OPERATOR INSPECTION	CONCRETE CURB	INDUST. SEWER
14	14-5 AST TANK	FERROUS CHLORIDE	2250 GAL	DAILY OPERATOR INSPECTION	CONCRETE CURB	INDUST. SEWER
14	A-14 UST TANK	HAZ WASTE SLUDGE, F006	120000 GAL	LINER INSPECTION, 5 YR CYCLE	SYNTHETIC LINER	SOIL & GROUND WATER
16	16-1 AST TANK	CARBON DIOXIDE	6000 GAL	VISUAL-HI OCCUPANCY	NONE	VAPORIZATION
20	20-1 AST TANK	DIESEL FUEL	300 GAL	VISUAL - GUAGE	DOUBLE-WALL TANK	CONTAINMENT, THEN ASPHALT
22	22-1 AST TANK	PROPANE	203 GAL.	WEEKLY VISUAL INSPECTION	NONE	VAPORIZATION
22	A-22 UST TANK	DIESEL FUEL	10000 GAL	INVENTORY CONTROL	NONE	SOIL & GROUND WATER
22	B-22 UST TANK	UNLEADED GASOLINE	10000 GAL	INVENTORY CONTROL	NONE	SOIL & GROUND WATER
22	C-22 UST TANK	UNLEADED GASOLINE	8000 GAL	INTERSTITIAL MONITOR	DOUBLE WALL TANK	CONTAINMENT
22	WASTE REACTIVES BLDG	CYANIDE WASTES	1540 GAL	WEEKLY INSPECTION	YES	CONTAINMENT
26	26-1 AST TANK	Diesel Fuel	300 GAL	VISUAL - GUAGE	DOUBLE-WALL TANK	CONTAINMENT, THEN ASPHALT
27	27-10 AST TANK	21-271-A CONCENTRATE (CONTAINS ETHANOL)	400 GAL	DAILY VISUAL INSPECTION	CONCRETE FLOOR & CURB	CONTAINMENT AREA
27	27-11 AST TANK	DTE-25 OIL	3000 GAL	DAILY VISUAL INSPECTION	CONCRETE FLOOR & CURB	CONTAINMENT AREA
27	27-12 AST TANK	WASTE EMULSIFIED CUTTING OIL	6000 GAL	DAILY VISUAL INSPECTION	CONCRETE FLOOR & CURB	CONTAINMENT AREA
27	27-13 AST TANK	Dascool 2003A	1000 GAL	DAILY VISUAL INSPECTION	CONCRETE FLOOR & CURB	CONTAINMENT AREA
27	27-2 AST TANK	DTE-25 OIL (HYDRAULIC OIL)	2000 GAL	DAILY VISUAL INSPECTION	CONCRETE FLOOR & CURB	CONTAINMENT AREA

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Building	Location	Material	Capacity	Leak Detection	Secondary Containment	Spill Route
27	27-3 AST TANK	DTE-25 OIL (HYDRAULIC OIL)	2000 GAL	DAILY VISUAL INSPECTION	CONCRETE FLOOR & CURB	CONTAINMENT AREA
27	27-4 AST TANK	DTE-25 OIL (HYDRAULIC OIL)	2000 GAL	DAILY VISUAL INSPECTION	CONCRETE FLOOR & CURB	CONTAINMENT AREA
27	27-5 AST TANK	21-271-A (50:1 SOLUTION) - CONTAINS ETHANOL	4000 GAL	DAILY VISUAL INSPECTION	CONCRETE FLOOR & CURB	CONTAINMENT AREA
27	27-7 AST TANK	Dascool 2003A	2000 GAL	DAILY VISUAL INSPECTION	CONCRETE FLOOR & CURB	CONTAINMENT AREA
27	27-8 AST TANK	Dascool 2003A	2000 GAL	DAILY VISUAL INSPECTION	CONCRETE FLOOR & CURB	CONTAINMENT AREA
27	27-9 AST TANK	70% NITRIC ACID	6,000 GAL	pH ALARM IN SUMP	COATED SEC. CONT.	CONTAINMENT AREA
27	AG TANK 27-14	Dascool 2003A	1000 GAL	DAILY VISUAL INSPECTION	CONCRETE FLOOR & CURB	CONTAINMENT AREA
27	CHEM PROCESS AREA	ACIDS/CAUSTICS - VARIO PROCESSING TANKS	DUS	PH ALARM IN SEWER	BERM-INDUST. SEWER	INDUSTRIAL SEWER
27	DEPT. 162 DEGREASER	BRULIN 815GD SOLUTION	4605 GAL	NONE	BERM INDUST. SEWER	INDUST. SEWER
27	HAZ WASTE DRUM BLDG	WASTE OIL, SOLVENT, CORROSIVES	24640 GAL	DAILY INSPECTION	YES, TWO SEPARATE COMPARTMENTS	CONTAINMENT
27	STORES COOLER	SEALERS/FLAMMABLES	110 GAL.	VISUAL DAILY INSPECTION	COOLER FLOOR	COOLER FLOOR
28	A-28 UST TANK	JET FUEL	5000 GAL	INTERSTITIAL MONITOR	DOUBLE WALL TANK	CONTAINMENT
28	B-28 UST TANK	JET FUEL	5000 GAL	INTERSTITIAL MONITOR	DOUBLE WALL TANK	CONTAINMENT
28	C-28 UST TANK	WASTE JET FUEL	5000 GAL	INTERSTIT. MONITOR/DAILY STICK	DOUBLE WALL TANK	CONTAINMENT
2 29	29-1 AST TANK	ARGON	2500 CU FT	VISUAL-MED OCCUPANCY	NONE	VAPORIZATION

Building	Location	Material	Capacity	Leak Detection	Secondary Containment	Spill Route
29	DEPT. 161H DEGREASER	DARA CLEAN #238 SOLUTION	10400 GAL	VISUAL-HI OCCUPANCY	CONCRETE PIT	INDUST. SEWER
029A	29A-1 AST TANK	CARBON DIOXIDE	5000 GAL	VISUAL-LOW OCCUPANCY	NONE	VAPORIZATION
029A	29A-2 AST TANK	LIQUID NITROGEN	7000 GAL	VISUAL-LOW OCCUPANCY	NONE	VAPORIZATION
029A	29A-3 AST TANK	ETHYLENE GLYCOL/WATER	7000	VISUAL-LOW OCCUPANCY	NONE	SOIL
029A	29A-4 CHEM PROCESS AREA	ACID/CAUSTIC PROCESS TANKS		VISUAL-HI OCCUPANCY	CONCRETE PIT	CONTAINMENT, THEN FLOOR
029A	29a-5 AST TANK	EMERGENCY TANK FOR CHEM PROCESS	2900 GL	HI LEVEL ALARM	SECONDARY TANK	E <sub>2</sub>
33	33-1 AST TANK	DIESEL FUEL	275 GAL	VISUAL - LOW OCCUPANCY	CONCRETE BERM	CONTAINMENT, THEN FLOOR
34	34-1 AST TANK	DIESEL FUEL	275 GAL	VISUAL - LOW OCCUPANCY	CONCRETE BERM	CONTAINMENT, THEN FLOOR
39	STORES	CORROSIVES AND OXIDIZERS	1000 GAL.	VISUAL-DAILY INSPECTION	BERMED AREA	CONTAINMENT
039A	PCB STORAGE	PCB'S FOR DISPOSAL	2280 GAL.	WEEKLY INSPECTION	YES	CONTAINMENT
40	40-1 AST TANK	PROPANE		VISUAL	NONE	VAPORIZATION
40	WASTE DRUM SHELTER	WASTE OIL AND SOLVENTS	1400 GAL.	VISUAL-MED OCCUPANCY	YES	CONTAINMENT
41	41-1 AST TANK	DIESEL FUEL	300 GAL	VISUAL-HI OCCUPANCY	NONE	B.41 OIL/WATER SEPARATOR
41	A-41 UST TANK	JET FUEL	30000 GAL	INTERSTITIAL MONITOR	DOUBLE WALL TANK & LINES	CONTAINMENT
41	B-41 UST TANK	JET FUEL	30000 GAL	INTERSTITIAL MONITOR	DOUBLE WALL TANK & LINES	CONTAINMENT
41	C-41 UST TANK	JET FUEL	30000 GAL	INTERSTITIAL MONITOR	DOUBLE WALL TANK & LINES	CONTAINMENT
41	D-41 UST TANK	JET FUEL	30000 GAL	INTERSTITIAL MONITOR	DOUBLE WALL TANK & LINES	CONTAINMENT

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Building	Location	Material	Capacity	Leak Detection	Secondary Containment	Spill Route
41	E-41 UST TANK	UNLEADED GASOLINE	8000 GAL	INTERSTITIAL MONITOR	DOUBLE WALL TANK AND LINES	CONTAINMENT
41	F-41 UST TANK	JET FUEL	8000 GAL	INTERSTITIAL MONITOR	DOUBLE WALL TANK & LINES	CONTAINMENT
41	G-41 UST TANK	WASTE FUEL- SEPARATOR	3200 GAL	HIGH LEVEL ALARM W/TELEPHONE RELAY	COATED STEEL	OVERFLOW TO INDUSTRIAL LIFT STATION
41	STORES	FLAMMABLES	200 GAL	VISUAL DAILY INSPECTION	NONE	DOPE HOUSE FLOOR
45	45-1 AST TANK	LIQUID NITROGEN	1000 GAL	VISUAL-HI OCCUPANCY	NONE	VAPORIZATION
45	45-2 AST TANK	DIESEL FUEL	335 GAL	VISUAL-MED OCCUPANCY	NONE	CONCRETE FLOOR
045A	45A-1 AST TANK	LIQUID OXYGEN	1000 GAL	VISUAL-LOW OCCUPANCY	NONE	VAPORIZATION
045K	45K-SEP	WASTE FUEL- SEPARATOR	800 GAL	HIGH LEVEL SHUTOFF /ALARM W/TELEPHONE RELAY	CONCRETE VAULT	VAULT
48	PAINT SHOP SHELTER	MEK, PAINTS, FLAM. LIQUIDS	900 GAL	VISUAL- LOW OCCUPANCY	NONE	CONCRETE PAD, THEN STORM SEWER
049A	49A-1 AST TANK	PROPANE	1000 GAL	WEEKLY INSPECTION	NONE	VAPORIZATION
049A	49A-2 AST TANK	PROPANE	1000 GAL	WEEKLY INSPECTION	NONE	VAPORIZATION
51	51-2 AST TANK	SODIUM HYDROXIDE WASTE (20%)	10000 GAL	DAILY VISUAL INSPEC	BERM-INDUST. SEWER	INDUST, SEWER
51	51-3 AST TANK	SODIUM HYDROXIDE WASTE (20%)	10000 GAL	DAILY VISUAL INSPEC	BERM-INDUST. SEWER	INDUST. SEWER
51	51-4 TOTES	AQUAMMONIA	660 GAL	VISUAL-MED OCCUPANCY	NONE	CONCRETE FLOOR
51	WASTE DRUM SHELTER	WASTE SOLVENTS, OILS	2000 GAL	DAILY INSPECTION	YES	CONTAINMENT

Building	Location	Material	Capacity	Leak Detection	Secondary Containment	Spill Route
	52-1 (4) AST TANK	NITRIC ACID (BULK)	6,000 GAL	PH ALARM IN SUMP	COATED CONCRETE CONT.	CONTAINMENT, THEN INDUST. SEWER
52	52-1 (5) AST TANK	SODIUM HYDROXIDE 50%	6,000 GAL	PH ALARM IN SUMP	COATED CONCRETE CONT.	CONTAINMENT, THEN INDUST. SEWER
52	52-1(1) AST TANK	NITRIC HYDROFLUORIC WASTE	850 GAL EACH	DAILY VISUAL INSPEC	BERM-INDUST. SEWER	INDUST. SEWER
52	52-1(2) AST TANK	NITRIC HYDROFLUORIC WASTE	850 GAL	DAILY VISUAL INSPEC	BERM-INDUST. SEWER	INDUST. SEWER
52	52-1(6) AST TANK	DIESEL FUEL	50 GL	VISUAL MED OCCUPANCY	NONE	CONCRETE FLOOR
52	52-1(3) AST TANK	NITRIC HYDROFLUORIC WASTE	850 GAL	DAILY VISUAL INSPEC	BERM-INDUST. SEWER	INDUST. SEWER
52	CHEM PROCESS AREA	ACIDS/CAUSTICS - VARIO PROCESSING TANKS	OUS CHEM	pH ALARM IN SEWER	BERM-INDUST. SEWER	INDUST. SEWER
52	STORAGE SHELTERS(3)	HYDROFLUORIC ACID	3300 GAL.	pH ALARM IN SEWER	BERM-INDUSTRIAL SEWER	INDUST. SEWER
54	54-1 AST TANK	WASTE NITRIC ACID - OUT OF SERVICE	6000 GAL	pH ALARM IN SEWER	BERM-INDUST. SEWER	INDUST. SEWER
64	64-1 AST TANK	ANHYDROUS AMMONIA	500 GAL	VISUAL-HI OCCUPANCY	NONE	VAPORIZATION
66	66-1 AST TANK	GASOLINE	300 GAL	VISUAL	NONE	SOIL
66	A-66 UST TANK	FUEL OIL	4000 GAL			
67	67-1 AST TANK	DIESEL FUEL	100 GAL	VISUAL - LOW OCCUPANCY	NONE	CONCRETE FLOOR, THEN SANITARY SEWER
72	72-1 AST TANK	GASOLINE	500 GAL	VISUAL-MED OCCUPANCY	NONE	ASPHALT,THEN SOIL
91	WASTE DRUM SHELTER	WASTE OILS AND SOLVENTS	600 GAL.	VISUAL-MED OCCUPANCY	YES	CONTAINMENT
101	101-1 AST TANK	ARGON	2000 GAL	VISUAL-HI OCCUPANCY	NONE	VAPORIZATION

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Building	Location	Material	Capacity	Leak Detection	Secondary Containment	Spill Route
101	101-10 AST TANK	DIESEL FUEL	525 GAL	VISUAL - MED OCCUPANCY	NONE	CONCRETE, THEN SEWER
101	101-2 AST TANK	LIQUID NITROGEN	450 CU FT	VISUAL-HI OCCUPANCY	NONE	VAPORIZATION
101	101-3 AST TANK	LIQUID NITROGEN	7000 GAL	VISUAL-HI OCCUPANCY	NONE	VAPORIZATION
101	101-5 AST TANK	LIQUID NITROGEN	2000 GAL	VISUAL-MED OCCUPANCY	NONE	VAPORIZATION
101	101-7 AST TANK	ANHYDROUS AMMONIA	500 GAL	VISUAL-MED OCCUPANCY	NONE	VAPORIZATION
101	101-8 AST TANK	NITRIC ACID (69%)	5000 GAL	DAILY VISUAL INSPECTION	CONCRETE CONTAINMENT	INDUST. SEWER
101	101-9 AST TANK	CARBON DIOXIDE FLASHJET	28000 LBS	VISUAL - MED OCCUPANCY	NONE	VAPORIZATION
101	AG TANK 101-4	TF SOLVENT - CONTAINS TRICHLOROTRIFLUORO ETHANE	3 2600 GAL	VISUAL-MED OCCUPANCY	CONCRETE-OPEN DRAIN	SOIL
101	CHEM PROCESS AREA	ACIDS/CAUSTICS - VARIO PROCESSING TANKS	OUS CEHM	pH ALARM IN SEWER	BERM-INDUST. SEWER	INDUST. SEWER
101	DEPT. 155A DEGREASER	TRICHLOROETHYLENE	98 GAL	VISUAL-HI OCCUPANCY	CONCRETE FLOOR	CONTAINMENT IN BLDG
101	DEPT. 157C DEGREASER	BRULIN 815GD SOLUTION	2700 GAL	VISUAL-HI OCCUPANCY	CONCRETE FLOOR & CURB	INDUSTRIAL SEWER
101	East side of 101, Two Mobile Tanks	Waste Ferrous Chloride	2000 Gal	VISUAL-MED OCCUPANCY	CONCRETE CONTAINMENT	CONTAINMENT, THEN SOIL
101	WASTE DRUM SHELTER	WASTE OIL, SOLVENT, CORROSIVES		DAILY INSPECTION- PH ALARM IN SEWER	CONCRETE FLOOR AND CURB	CONTAINMENT- OIL/SOLV INDUST- CORROSIVES
101A	101A-1 AST TANK	LIQUID NITROGEN	15000 GAL	VISUAL-MED OCCUPANCY	NONE	VAPORIZATION
101A	AG TANK 101A-2	LIQUID NITROGEN	15000 GAL	VISUAL-MED OCCUPANCY	NONE	VAPORIZATION
102	102-1 AST TANK	LIQUID NITROGEN	2500 GAL	VISUAL-HI OCCUPANCY	NONE	VAPORIZATION

	g Location	Material	Capacity	Leak Detection	Secondary Containment	Spill Route
102	102-2(1) AST TANK	HELIUM	60 CU FT	VISUAL-MED OCCUPANCY	NONE	VAPORIZATION
102	102-2(2) AST TANK	HELIUM	60 CU FT	VISUAL-MED OCCUPANCY	NONE	VAPORIZATION
102	102-2(3) AST TANK	HELIUM	60 CU FT	VISUAL-MED OCCUPANCY	NONE	VAPORIZATION
102	102-2(4) AST TANK	HELIUM	60 CU FT	VISUAL-MED OCCUPANCY	NONE	VAPORIZATION
102	102-6 AST TANK	LIQUID NITROGEN	15000 GAL	VISUAL-HI OCCUPANCY	NONE	VAPORIZATION
102	102-7 AST TANK	DIESEL FUEL	275 GAL	VISUAL	DOUBLE WALL	CONTAINMENT, THEN SOIL
102	102-8 AST TANK	JET FUEL - TEST STATION	275 GAL	VISUAL	DOUBLE-WALL TANK	CONTAINMENT
102	102-9 AST TANK	WASTE OIL & WATER	345 GAL	VISUAL	NONE	ASPHALT, THEN SOIL
102	B-102 UST TANK	FUEL OIL	20000 GAL	FLOW METER ONLY	NONE	SOIL & GROUND WATER
102A	102A-1 AST TANK	LIQUID NITROGEN	7000 GAL	VISUAL-HI OCCUPANCY	NONE	VAPORIZATION
103	103-3 AST TANK	LIQUID NITROGEN	10000 GAL	VISUAL-HI OCCUPANCY	NONE	VAPORIZATION
103	103-4(1) AST TANK	HELIUM	11 CU FT	VISUAL-MED OCCUPANCY	NONE	VAPORIZATION
103	103-4(2) AST TANK	HELIUM	11 CU FT	VISUAL-MED OCCUPANCY	NONE	VAPORIZATION
103	103-4(3) AST TANK	HELIUM	11 CU FT	VISUAL-MED OCCUPANCY	NONE	VAPORIZATION
103	103-5 AST TANK	DIESEL FUEL	300 GAL	VISUAL	NONE	SOIL
103	103-6 AST TANK	GASOLINE	300 GAL	VISUAL	NONE	SOIL
103	A-103 UST TANK	DIESEL FUEL	1000 GAL	MONTHLY GUAGING	NONE	SOIL

Building	Location	Material	Capacity	Leak Detection	Secondary Containment	Spill Route
107	A-107 UST TANK	DIESEL FUEL	4000 GAL	MONTHLY GUAGING	NONE	SOIL
110	110-1 AST TANK	LIQUID NITROGEN	6000 GAL	VISUAL-LOW OCCUPANCY	NONE	VAPORIZATION
110	A-110 UST TANK	FUEL OIL	15000 GAL	NONE	NONE	SOIL & GROUND WATER
111	111-1 AST TANK	LIQUID NITROGEN	3000 GAL	VISUAL-MED OCCUPANCY	NONE	VAPORIZATION
111	111-3 AST TANK	LIQUID NITROGEN	9000 GAL	VISUAL-MED OCCUPANCY	NONE	VAPORIZATION
111	A-111 UST TANK	FUEL OIL	550 GAL	FLOW METER ONLY	NONE	SOIL & GROUND WATER
111	B-111 UST TANK	FUEL OIL	12000 GAL	VISUAL	CONCRETE VAULT	UNDERGROUND VAULT
111	PAINT STORAGE, LEVEL 1	FLAMMABLE PAINTS	200 GAL	VISUAL-MED OCCUPANCY	CONCRETE CONTAINMENT	CONTAINMENT, FLOOR OF BLDG
120	120-1 AST TANK	FUEL OIL	100000 GAL	'WEEKLY VISUAL INSPEC	EARTHEN DIKE	SOIL
120	120-2 AST TANK	FUEL OIL	50000 GAL	WEEKLY VISUAL INSPEC	EARTHEN DIKE	SOIL
120	120-3 AST TANK	DIESEL FUEL	275 GAL	VISUAL-WEEKLY	NONE	SOIL
120	120-4 AST TANK	GASOLINE	550 GAL	VISUAL-WEEKLY	STEEL CONTAINMENT AROUND TANK	CONTAINMENT
120	STORES	FLAMMABLES	400 GAL.	VISUAL-DAILY INSPECTION	NONE	DOPE HOUSE FLOOR
122	122-1 AST TANK	DIESEL FUEL	300 GAL	VISUAL-LOW OCCUPANCY	NONE	SOIL
220	220-1 AST TANK	LIQUID NITROGEN	7000 GAL	VISUAL-MED OCCUPANCY	NONE	VAPORIZATION
220	CHEM PROCESS AREA	ACIDS/CAUSTICS - VAR PROCESSING TANKS	NOUS CHEM	PH ALARM IN SEWER	BERM - INDUSTRIAL SEWER	INDUSTRIAL SEWER

	g Location	Material	Capacity	Leak Detection	Secondary Containment	Spill Route
220	DEPT. 184 DEGREASER	TRICHLOROETHYLENE	210 GAL	VISUAL-HI OCCUPANCY	CONCRETE FLOOR & CURB	INDUST. SEWER
245	245-1 AST TANK	ANHYDROUS AMMONIA	500 GAL	VISUAL-MED OCCUPANCY	NONE	VAPORIZATION
245	245-2 AST TANK	GASOLINE	275 GAL	VISUAL-MED OCCUPANCY	NONE	SOIL
245	245-3 AST TANK	DIESEL	275 GAL	VISUAL-MED OCCUPANCY	NONE	SOIL
245	245-4 AST TANK	LIQUID NITROGEN	6000 GAL	VISUAL-MED OCCUPANCY	NONE	VAPORIZATION
245	WASTE DRUM SHELTER	WASTE OILS & SOLVENTS	2000 GAL.	VISUAL-MED OCCUPANCY	YES	CONTAINMENT
270	270-1 AST TANK	DIESEL FUEL	560 GAL	VISUAL - MED OCCUPANCY	NONE	CONCRETE FLOOR, THEN SOIL
276	276-1 AST TANK	LIQUID NITROGEN	7000 GAL	VISUAL-MED OCCUPANCY	NONE	VAPORIZATION
276	276-2 AST TANK	GASOLINE	275 GAL	VISUAL-MED OCCUPANCY	CONCRETE VAULT	CONTAINMENT
276	276-3 AST TANK	DIESEL FUEL	275 GAL	VISUAL-MED OCCUPANCY	CONCRETE VAULT	CONTAINMENT
276	DEPT. 113 DEGREASER	TRICHLOROETHYLENE	50 GAL	VISUAL-HI OCCUPANCY		
276	WASTE DRUM SHELTER	WASTE OIL, SOLVENT, CORROSIVES	2000 GAL.	VISUAL-MED OCCUPANCY	DIVIDED CONTAINMENT	CONTAINMENT
40	40-SEP	WASTE FUEL - SEPARATOR	800 GAL	HIGH LEVEL SHUTOFF ALARM W/TELEPHONE RELAY	CONCRETE VAULT	COLLECT IN VAULT
506	506-1- AST TANK	DIESEL FUEL	275 GAL	VISUAL - LOW OCCUPANCY	NONE	SOIL
506	A-506 UST TANK 506-1)	( UNLEADED GASOLINE	1000 GAL	INTERSTITIAL MONITOR	DOUBLE WALL TANK AND LINES	CONTAINMENT
598	598-11 AST TANK	UNLEADED GASOLINE	550 GAL	ALARM IN CONTAINMENT	DOUBLE WALL TANK W/CONTAINMENT	CONTAINMENT

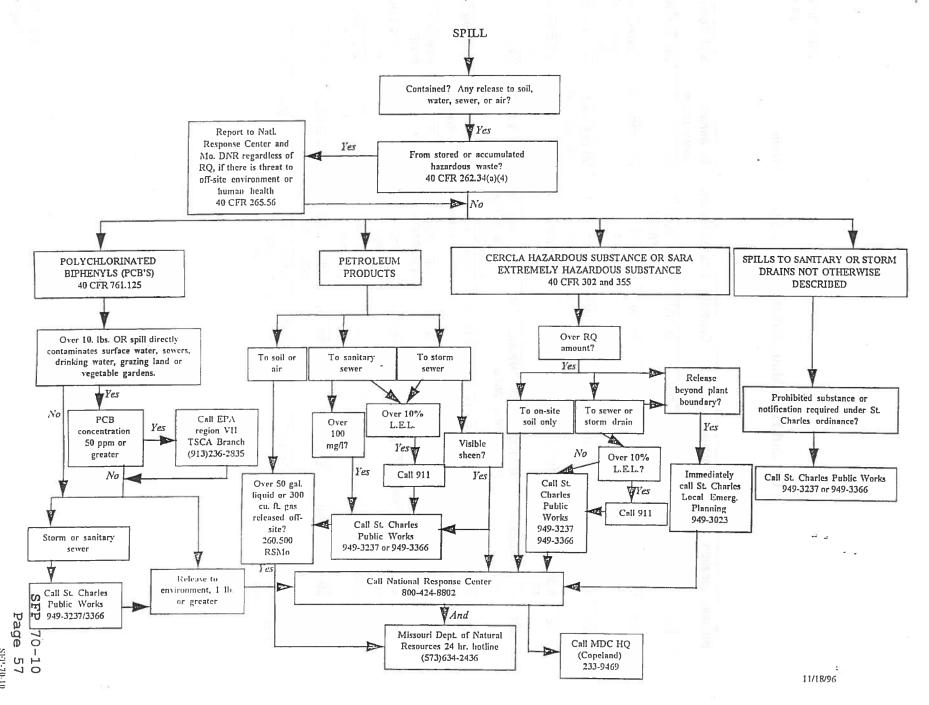
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# Oil and Hazardous Substance Storage Locations

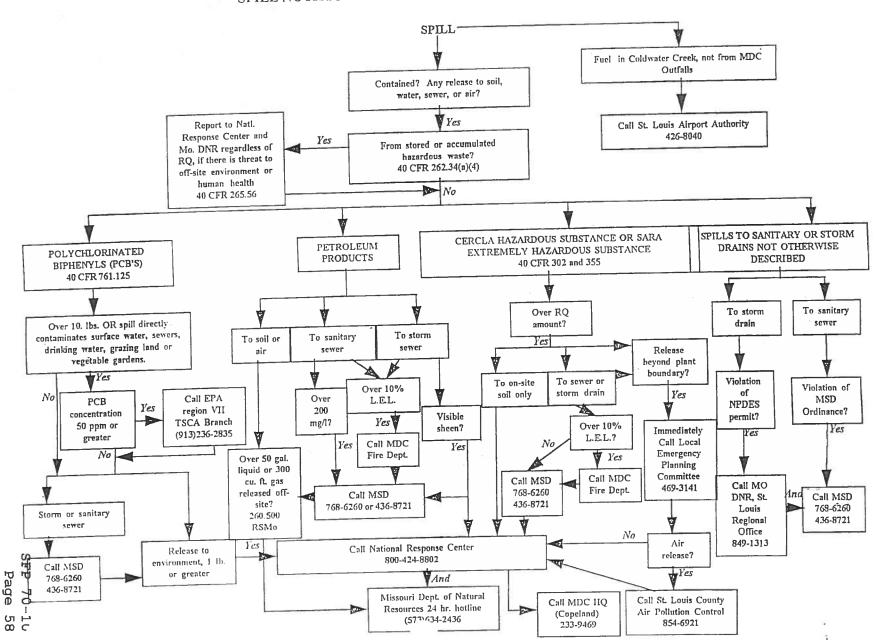
Building	Location	Material	Capacity	Leak Detection	Secondary Containment	Spill Route
598	598-12 AST TANK	LIQUID NITROGEN	7000 GAL	VISUAL-MED OCCUPANCY	NONE	VAPORIZATION
598	598-B	PAINT, SOLVENT STORAGE	800 GAL	VISUAL-MED OCCUPANCY	CONTAINMENT	CONTAINMENT, THEN ASPHALT, SEWER
598	A-598 UST TANK (598- 1)	JET FUEL	10000 GAL	INTERSTITIAL MONITOR	DOUBLE WALL TANK AND LINES	CONTAINMENT
598	B-598 UST TANK (598- 10)	FUEL OIL	25000 GAL	INVENTORY CONTROL	NONE	SOIL/GROUNDWA TER
598	CHEM PROCESS AREA	ACIDS/CAUSTICS - VAF PROCESSING TANKS	RIOUS CHEM	ALARM - WATER TREATMENT PLANT AUTO SHUTOFF	BERM - WWTP	WWTP
598	WASTE DRUM SHELTER	WASTE OIL, SOLVENT,	CORROSIVES	VISUAL-DAILY INSPECTION	DIVIDED CONTAINMENT	CONTAINMENT
598	WASTEWATER TREATMENT PLANT	ACIDS/CAUSTICS - VAR	RIOUS TANKS	DAILY VISUAL INSPECTIONS	CONCRETE FLOOR - CURB	SANITARY SEWER
599	A-599 UST TANK (599- 7)	FUEL OIL	12000 GAL	INVENTORY CONTROL	NONE	SOIL/GROUNDWA TER
HQ	A-HQ UST TANK	DIESEL FUEL	670 GAL	INVENTORY CONTROL	NONE	SOIL & GROUND WATER
SMARTT FIELD	SMFD-1 AST TANK	DIESEL FUEL	300 GAL	VISUAL-LOW OCCUPANCY	DOUBLE WALL	SOIL
SMARTT FIELD	SMFD-2 AST TANK	GASOLINE	300 GAL	VISUAL-LOW OCCUPANCY	DOUBLE WALL	SOIL

#### SPILL NOTIFICATION CHART, MDA-E ST. CHARLES COUNTY



14-29

# SPILL NOTIFICATION CHART, MDA-E ST. LOUIS COUNTY



Location of container storage shed (approx.) Bldg. 276 pnw

DATE 2/18/99

STORAGE AREA BLDG, 276

SIGNATURE a. Obell Mª Collough

1. 引伸的路径的路梯的线机	能超新超	Agree	Disagree	Corrective Action	Date	1
1 Proper containers		/				1
2 Containers inside she	elter	1				1
3 Containers in good co	ondition	/				1
4 Containers sealed	<b>T</b> —	/	-			1
5 Containers not leaking	g	/				1
6 No material on top of	drums	$\checkmark$			1 :	1
7 Proper labels	= =		×	(1) DRUM #C980434 IDENTFIED WITH SPRAYED OUT WRONJ LABEL TWO HAZARDOUS WASTE LABELS. "OILH" AND OK NOW	2/22	1
8 Labels facing aisle		1				1
9 Less than 90 day stor	rage	1				
0 Incompatible waste s	eparate	1	×	E980648 (043) OVER SAME SPILL CONTAINMENT. TRUCK RUN, OR NOW	2/24	1
1 Aisle space adequate	·	1				1
2 Housekeeping adequ	ate	1	<u></u>			
3 Spill containment em	pty	1			-	
4 Containment In good	condition	1	1		-	
5 Warning signs in plac	e	1				1

Additional Comments: ITEM #10 FIRST NOTED ON 2/4/99.

DATE 2/11/99

STORAGE AREA	BLDC.	276	

SIGNATURE a. Colol ME Colongh

<b>是有關係的自由的對於兩個表</b>	聚'Agree演	Disagree	指揮的超過音音中的中华 Comments 治疗之外治疗法院,所以不是一种种的一种,这种种种的一种,是一种种的一种,是一种种种的一种,是一种种种的一种,是一种种种的一种,	等 增 Date 新
1 Proper containers	/			
2 Containers inside sheller	1			
3 Containers in good condition	1			
4 Containers sealed	1	4		
Containers not leaking	1			
6 No material on top of drums	1			
7 Proper labels		×	(2) DRUMS OF SAND BLAST-NO HAZARDOUS LABELS. LABELAD DRUMD (1) DRUM OF PAINT WASTE (NIP/N)-NO HAZARDOUS WASTE STORAGE LABELS.	2/16
8 Labels facing aisle	/			
9 Less than 90 day storage	1			
0 Incompatible waste separate		X	PAINT WASTE DRUM IN ITEM #7 LOCATED CVER SAME SPILL CONTAINMENT WITH DRUM #E980535 (GI3) - CHROMIC ACID.	3/24
1 Aisle space adequate	/			
2 Housekeeping adequate	1			
3 Spill containment empty	1			
4 Containment in good condition	1		·	
5 Warning signs in place		Landing		

Additional Comments: THE (2) DRUMS OF SANDBLAST IN ITEM #7 HAVE NEITHER THE REQUIRED "HAZAROGUS WASTE ACCUMULATION"

LABEL OR THE "HAZAROGUS WASTE STURBOG" CABEL.

ITEMS \$7 AND \$10 FIRST NOTED ON 2/4/99.



DATE 2/4/99

STORAGE AREA	BLDG.	276	
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SIGNATURE a. Odell ME Collough

	Agree	Disagree	Comments	Corrective Action	Date
1 Proper containers	/				
2 Containers inside shelter	1		<u> </u>		
3 Containers in good condition	1				
4 Containers sealed	/				
5 Containers not leaking	1				
6 No material on top of drums	/			×	l k—
7 Proper labels		X	(2) DRUMS OF SAND BLAST - NO HAZARDOUS LAB LI) DRUM OF PAINT WASTE (NIP/N) - NO HAZARDOUS WASTE STURAGE LABEL.	ELS.	3/16
8 Labels facing aisle	/				
9 Less than 90 day storage					=
10 Incompatible waste separate		X	PAINT WASTE DRUM IN ITEM #7 LOCATED OVER SAME SPILL CONTAINMENT WITH DRUM # E.980535 (013) CHROMIC ACID.		3/24
11 Aisle space adequate	1				
t2 Housekeeping adequate	V.				
13 Spill containment empty	/				
14 Containment in good condition	1			§	
15 Warning signs in place	1				

Additional Comments: THE (2) DRUMS OF SHADBLAST HAVE PEITHER THE REQUIRED "HAZARDEUS WASTE ACLUMULATION" LABEL CR THE "HAZAROOUS WASTE STORAGE" LABEL.



DATE 1 128199

STORAGE AREA	BLDG.	276	

SIGNATURE a. Odell ME Collough

	Agree	Disagree	Comments	Corrective Action	Date
1 Proper containers	/				
2 Containers inside shelter	1				
3 Containers in good condition	/				
4 Containers sealed	1				
5 Containers not leaking	1				
6 No material on top of drums	V				
7 Proper labels	1				
8 Labels facing aisle	1				
9 Less than 90 day storage	/				
10 Incompatible waste separate	1				
11 Aisle space adequate	1				
12 Housekeeping adequate	1				
13 Spill containment empty	/				
14 Containment in good condition	1				
15 Warning signs in place	/		12		

Additional Comments:



DATE	-1	121	19	9

STORAGE AREA BLDG. 276

SIGNATURE a. Odell ME Collough

	Agree	Disagree		Comments		<b>建</b> 种系列性对于	Corrective	Action (E) (I)	<b>的图图</b>	Date
1 Proper containers	1		S. J.		_					
2 Containers inside shelter	1						3 IL		``	
3 Containers in good condition	1	_						·		
4 Containers sealed	1		- · · ·					п		
5 Containers not leaking	/	- i								
6 No material on top of drums	1									
7 Proper labels	1						Ť			
8 Labels facing aisle	1				l K		- 12	_		
9 Less than 90 day storage	5									
0 Incompatible waste separate	1				<i>p</i>					
1 Aisle space adequate	1							A Blog I		
2 Housekeeping adequate	1									
3 Spill containment empty	V						7/			H
4 Containment in good condition	1				•					
5 Warning signs in place										

**Additional Comments:** 



BUILDING: 276	
DATE: 10/2/97	
INSPECTOR: ODELL Mc COLLOUGH	
SIGNATURE: Odell ME Clough	
State The Godinge	
CONTAINER CHECK	COMMENTS + REPEAT
agree disagre  1. Proper containers  2. Not leaking  3. No struc. damage  4. Drums sealed	DRUM #E976452 AND DRUM WITH  NO NUMBER (BOTH '037'), HAVE  LABELS DAMAGED AND ILLEGIBLE  MARKINGS.
*5. Proper labels  6. Accum. date  7. <90 day storage  8. No heat/pressure	DRUM OF PAINT WASTE HAS  'EMPTY' AND "WASTE ACCUMULATION'  LABELS (CONFLICTING) AND NO  HAZARDOUS WASTE STORAGE AND  TRANSPORTATION LABEL.
9. Sumps empty 10. All containers inside shelter 11. Incompatible waste separate 12. No leaks/spills 13. Aisle space adequate 14. No material on top of drums  ACTION TAKEN ON ALL DISCREPANCIES:	TWO DRUMS HAVE WASTE LABELS FACING AGAINST WALL OF SHELTER.  ALL DRUM LABELS WITH BOEING IN THE ADDRESS, MUST BE CHANGED TO M.D.C.
5- NUMBERED & RELABELED DRUM 5- LABELED DRUM - 10-6-97 MOVED DRUMS 50 LABELES A CHANGES AN DRUM LABELS THAT	- Ms - 16-6pm

イルルリタ/ ら<sup>\*(</sup> Request For Laboratory Analysis DATE SAMPLE TAKEN SAMPLE NUMBER MATERIAL/SOLUTION MO. ID 4-99 GRIT BIAST 990085 125 REQUESTED REQUESTER MAILCODE TELEPHONE NO **Parameter** Method Number Value Units Method Analyst Date 19-3320B 750 -17-90 Alkalinity mg/1Std Mtd X Arsenic Sm 50.5 601013 8-6-99 mg/1 SW 846 X Barium 45.0 OM 8-6-99 6010B SW 846 mg/1<0.1 8nc) L Beryllium 6010B 8-6-99 SW 846 mg/1 <0.1 Sm 6010B Cadmium 8-6-99 mg/1 SW 846 8m2 <100 DPSIL 12-9 Chromium (hex) SW 846 mg/1 10.5 60108 Smo Chromium (total) SW 846 mg/1 Copper SW 846 mg/1X Cyanide mg/1 SW 846 Ferric Chloride mg/1 SW 846 7140 CD °F 1030 06/3019 SW 846 Flash Point Inorganic Chlorides % wt. HCL Std Mtd % wt. HF Std Mtd Inorganic Fluorides Inorganic Nitrates % wt. HNO3 Std Mtd Inorganic Phosphate % wt H 3 PO 4 Std Mtd - Inorganic Sulfates % wt. H 2 SO 4 Std Mtd Bn tron Antimony 8-6-99 6010B mg/1 SW 846 239 X Lead 8-6-59 6010B Bru mg/1 SW 846 (0.00S 8m 8-16-99 Mercury 7470 mg/1 SW 846 <0.5 gne 8-6-99 ickel 6010R SW 846 mg/1Nitrite/Nitrate mg/1 Std Mtd Organic Chlorides % wt. Chlorin **ASTM D808 PCB** ppm EPA/OIL <0.5 Phonol Thallier 6010B 5m 8-6-99 SW 846 mg/1 pH Y Potassium CD 06-18-99 71.0 9041 SW 846 BM-<T <0.01 8mi 6010B % wt KOH SW 846 Residue At 105° C % wt. Solids Std Mtd <0.5 6010B Sm 8-6-99 \_ Selenium mg/1 SW 846 🗶 Sodium 0.20 6010B My % wt. NaOH SW 846 Sulfide Silver <0.5 6010B 8m mg/1 SW 846 Zinc No Herb SW 846 ppm Realtailie il 134 mg/1 SW 846 NEG 14 06/20199 3.3 X Reactivity SW 846 0.28 lu 07/01/99 ∠ Volatiles 100° C 19-254UB % wt. Std Mtd .35 19-2590E 07/01/99 Volatiles 600 C u % wt. Std Mtd 333 X Specific Gravity CD 06-25-99 ASTM D891-96 Total Halogen ASTM D808 Remarks TCLP METALS ONLY E990168, 193 Thallium, ANTIMONY

# ANALYTICAL CHEMISTRY LABORATORY REPORT

ACL # 20384-37		CUST # F99	00085	
Reactivity	NEG	Volatiles @ 100 C	20.28	Wt%
h-man	p. 110 kHz 10	Volatiles @ 600 C	20.35	Wt%
рН	7.0	Flashpoint	NEGATIVE	Deg F

## TCLP CHARACTERISTICS

EPA HW	CONTAMINANT	CAS NUMBER	REGULATORY LEVEL	MEASURED LEVEL
NUMBER		A 20	(mg/L)	(mg/L)
D004	Arsenic	7440-38-2	5.0	<0.5
D005	Barium	7440-39-3	100.0	<5.0
D018	Benzene	71-43-2	0.5	<0.25
D006	Cadmium	7440-43-9	1.0	<0.1
D019	Carbon Tetrachloride	56-23-5	0.5	<0.05
D020	Chlordane	57-74-9	0.03	*
D021	Chlorobenzene	108-90-7	100.0	<0.1
D022	Chloroform	67-66-3	6.0	<0.1
D007	Chromium	7440-47-3	5.0	<0.5
D023	o-Cresol	95-48-7	200.0	<1.0
D024	m-Cresol	108-39-4	200.0	<1.0
D025	p-Cresol	106-44-5	200.0	<1.0
D026	Cresol		200.0	<1.0
D016	2,4-D	94-75-7	10.0	*
D027	1,4-Dichlorobenzene	106-46-7	7.5	<1.0
7028	1,2-Dichloroethane	107-06-2	0.5	< 0.05
029	1,1-Dichloroethylene	75-34-4	0.7	< 0.05
D030	2,4-Dinitrotoluene	121-14-2	0.1	< 0.05
D012	Endrin	72-20-8	0.0	*
D031	Heptachlor (and its hydroxide)	76-44-8	0.0	me * do ac n
D032	Hexachlorobenzene	118-74-1	0.1	< 0.08
D033	Hexachlorobutadiene	87-68-3	0.5	<0.1
D034	Hexachloroethane	67-72-1	3.0	< 0.5
D008	Lead	7439-92-1	5.0	239
D013	Lindane	58-89-9	0.4	< 0.005
D009	Mercury	7439-97-6	0.2	<0.2
D014	Methoxychlor	72-43-5	10.0	* replanation Co. C
D035	Methyl ethyl ketone	78-93-3	200.0	<1.0
D036	Nitrobenzene	98-95-3	2.0	<0.5
D037	Pentachlorophenol	87-86-5	100.0	<1.0
D038	Pyridine	110-86-1	5.0	<1.0
D010	Selenium	7782-49-2	1.0	<0.5
D011	Silver	7440-22-4	5.0	<0.5
D039	Tetrachloroethylene	127-18-4	0.7	< 0.05
D015	Toxaphene	8001-35-2	0.5	*
D040	Trichloroethylene	79-01-6	0.5	<0.25
D040	2,4,5-Trichlorophenol	95-95-4	400.0	<1
D041	2,4,6-Trichlorophenol	88-06-2	2.0	<0.1
D042	2,4,5-TP (Silvex)	93-72-1	1.0	*
D043	VinylChloride	75-01-4	0.2	< 0.05

<sup>\*</sup> Not determined due to nature of process that generated the sample

57 of 10.

Activity #: A

# DATA GATHERING WORKSHEET AND CHECKLIST INSTRUCTIONS AND KEY

- 1. Complete all items on the applicable data gathering worksheet and chacklist in a neat and legible fashion.
- a. Additional time spent legibly completing the forms in the field will reduce the need to rewrite the forms or explain the forms in the inspection report.
- 2. All responses will be based on the inspector's knowledge and best judgement at the time of the inspection.
- 3. A ( $\checkmark$ ) mark should be used to mark the all boxes ( $\Box$ ) and will indicate the choice made or the action completed.
- 4. The Records Review Worksheet and Checklists and the Visual Review Worksheet and Checklists each have a key below the tables. Use this key when filling out these forms.
- a. Items which are shaded gray on the worksheets and checklists are considered high priority items during inspections and should always be completed.
- b. On the top of the worksheets and checklists are a group of boxes which represent the generator status of the facility and whether or not the facility is subject to interim status or permit requirements. The appropriate box should be checked.
- 5. Several of the forms contain the following box at the bottom of the page:

DOCUMENTATION: HOW are the facts known? WHO said what? WHEN did it happen? and WHAT PROOF WAS OBTAINED?

The inspector should pay special attention to the questions contained in this box and make sure that they are able to answer them as relates to inspection documentation.

- 6. Each of the forms has a form number in the bottom left corner of the form and each item on the form is numbered and/or lettered. The form and item number/letters should be used when referencing information contained on the form in the inspection report.
- 7. Each of the forms has a space in the upper left hand corner of the form to track the information by activity number. Place the inspection activity number in the space
- 8. Each of the forms has a space in the upper right hand corner of the form to track the total number of pages used during the inspection. Count all forms used and complete this space.
- 9. The rest of the information on the forms is self-explanatory.

Attachment 18

	PageofC
GENERAL INFORMATION PRE-INSPECTION WORKS	<del></del>
1. Facility Name: Mc Dound Douglas Corp. Track	2. Inspection Date: 11/16-17/
3. Facility Address: 5775 Campus Parkway	4. EPA 1.D. #:MODOCOSIS9
Hazelwood MO 6304:	5. State I.D. #:
6. Location Information:	10.04
7. Facility Contact: Joseph Hacke	Phone 4: (314) 232-3319
8. Inspector Name/Title: David 17 Whiting Bill Eng.	Phone #: (3/4) 338 - 4959
9. Inspection Type:   SQG   TQG   TSD   Other	
	SIES COLO
<u>Date</u> <u>Hotel</u>	Phone # Rat
	( )
	( )
	( )
Additional inspection conducted during this trip?	( )
Where: Sabreliner Perryville MO	YES   NO
Where: Sabreliner Perryville MO	YES   NO
Where: Sabreliner Perryville MO  Compensatory time requested?   YES   NO   # of hor	YES   NO
Where: Sabreliner Perryville MO  Compensatory time requested?   YES   NO # of hor  Overnight vehicle requested?   YES   NO	YES DNO  Dates:
Where: Sabreliner Perryulle MO  Compensatory time requested?   YES   NO # of hor  Overnight vehicle requested?   YES   NO  Car signed out?   YES   NO   Vehicle #	YES
Where: Sabreliner Perryulle MO  Compensatory time requested?   YES   NO # of hor  Overnight vehicle requested?   YES   NO  Car signed out?   YES   NO   Vehicle #  NOTE: Provide a copy of this page for the secretary as	YES   NO  THES   NO  THES:  Dates:  Ind mark the copy -   Secretaries Co
Where: Sabreliner Perryulle MO  Compensatory time requested? TES TNO # of hor  Overnight vehicle requested? TES TNO  Car signed out? TES TNO  Vehicle #  NOTE: Provide a copy of this page for the secretary as  ///////////////////////////////////	YES NO  THES NO  Dates:  The mark the copy of Secretaries Company of
Where: Sabreliner Perryulle MO  Compensatory time requested? TES TNO # of hor  Overnight vehicle requested? TES TNO  Car signed out? TES TNO  Vehicle #  NOTE: Provide a copy of this page for the secretary as  ///////////////////////////////////	YES NO  THES NO  Dates:  The mark the copy of Secretaries Company of
Where: Sabreliner Perryulle MO  Compensatory time requested? TYES TNO # of hor Overnight vehicle requested? TYES TNO  Car signed out? TYES TNO  Vehicle #  NOTE: Provide a copy of this page for the secretary as	YES DNO  THES:  Dates:  I mark the copy - Decretaries Company - Dates:
Where: Sabreliner Perryulle MO  Compensatory time requested? TES NO # of hor Overnight vehicle requested? TES NO  Car signed out? TES NO  Vehicle #  NOTE: Provide a copy of this page for the secretary as  ///////////////////////////////////	YES NO  YES NO  Dates:  I Dates:  Secretaries Co
Where: Sabreliner Perryulle MO  Compensatory time requested?   YES   NO  # of hor Overnight vehicle requested?   YES   NO  Car signed out?   YES   NO    Vehicle #  NOTE: Provide a copy of this page for the secretary as  ///////////////////////////////////	YES NO  YES NO  Dates:  I Dates:  Secretaries Co
Compensatory time requested?	YES NO  YES NO  Dates:  I Dates:  Secretaries Co

14. Other Contacts/Phone # | N/A

Acceptance 2021.18 - Appendix 1-1				9 of 10
Activity #:			Page	3000
KEY INFORMATION FROM PILE REVIEW				
15. Date of last inspection: 6/9/ /y /	MONR	О ко	t previously	inspecte
16. Key information from last inspection: (operations, waste streams/codes, waste management)				
mana	dement broces	BBes, etc.)	with a state of	
18 6 11				
17. Compliance/Administrative issues from la	st inspection	n:		
	318 - 42 - 17			
18. Most recent notification copied: 2 YES	□ NO			
19. Key Interim Status information: EN/A		Key Permit	Information:	
(container/tank storage limits, etc.)			THIDIMACION:	O N/A
			mel	
20 07999 220022 (20)				
20. OTHER RECORDS/COMPLIANCE INFORMATION				
			A AL FILL	
	matter and the		uts memb	·
			reak .	9
21. Copies of facility map or diagram made?	O YES 2	NO DN/A		
22. Additional Notes:				
The state of the s	1			
ALL OF THE PROPERTY.				

Activity #:		
RESULTS OF DISCUSSIONS	WITH	COMPLIANC
23.		

Page 4 of 21

	RCRA Pre-Inspection Form
cility Name	MoDonnell Douglas Corp Tract IV
acility Address	5775 Campus Parkway
	Hazelwood, MO 63042
aculity ID#	MOD000818971
uspection Type(circle	)CEIFollowupInvestigationOther
ompliance Officer Nam	ne Kendra Kennell 913-551-7136
Si	pecific Instructions Regarding Inspection
	Date: September 8, 1999
McDonnell Douglas fis	t notified in August of 1980 as a large quantity generator. Their most
recent biennial report (	1997) lists their waste streams as:
solid waste from	cleaning and painting operations (D007, F002, F003, F005),
<ul> <li>spent non-haloge</li> </ul>	nated solvent (D001, D007, D008, D035, F003),
	d and non-halogenated solvent (D001, D007, D035, D040, F002),
	ste oil (F002, F005),
spent solvent from	m small parts cleaning (D001, D006, D008, D018, D027),
gasoline (D001,	
	id (D002, D007),
	er jet cutting (D008),
off-spec chemica	
· mercury hulhs (I	0009)
MaDamal David	
WICDonnell Douglas wa	as last inspected on June 7, 1991 by the state of Missouri. The two
ingressions of the hear	US include unmarked satellite containers and failure to do weekly
mspections of the haza	rdous waste storage area
Defermine ourrent w	aste streams handled. Make sure that facility is in compliance with
	nantity generator standards. Get a more detailed list of off spec
28 J 18 18 28 20 1 14 15 1 24 1 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2	

F NO. 2321.	1B - Appendix 1-1		
ivity #:			61-e
	•		Page 5
ADDITIONAL P	RE-INSPECTION ITEMS TO CHECK		
General Equipment:	- hardhat - rubber - safety glasses - tape m - other camera - notebo - calculator - compas - dictaphone - tape r - post-its - safety - coveralls - safety - film - ice ch - pH paper - batter	easure ok ecorder gloves boots	- safety shoes - SLR camera - flashlight - binoculars - pens/markers - winter gloves - ear plugs - coat - respirator
Special Equi	pment?:		reshtratol
Paperwork:	- facility files - NOV forms - Pollution Prevention forms - Data Collection Worksheets - Reference Information	- CBI forms - Notification - Multi-Media (Air, Wates - Regulation	on forms a forms r, SPCC, Title III s (Federal/State)
- Load Camer	a.		( July )
- Credential	8		
- Business C	ards		
- Daily Plans	Der		
	Bys/Credit Card		
	alth or Safety Considerations?		
	ne Message/Setting		
- Sign-out O			
Notes:			
		The second second	
<u>a</u>			
		· ·	:
	18 Table 1 State 1		
	and the Case of th		

ctivity #:		Page C o
	DRIVE-BY WORKSHEET	
Arrival time: 9:00		
. Drive-by conducted from	public right-of-way? TYES	□ NO
of the lawers and enders	"North" with respect to the sation (as can be viewed from	Alba middle milate e
not certain who no observes cone	ich blogs are MCD's; d	Prove all around served bil
. Obvious concerns visibl (Note area(s) of c	e from public right-of-way? oncern)	□ YES ☑ NO
☐ Containers	□ Tanks	☐ Processing Equipment
☐ Loading Areas	O Unloading Areas	☐ Security Devices
Open Drums	☐ Stressed Vegetation	□ Unusual Staining
☐ Unusual Odors	Obvious Discharges	☐ Improper Disposal
☐ Safety Concerns	Other Concerns	
. Notes/Observations:		
	E NO Photo Number	• · · · · · · · · · · · · · · · · · · ·
5. Photo's Taken?   YES		on/direction on sketch)

" 7251.10 - Wbbeugix 1-1	63 of
ctivity #:	Page
SITE ENTRY AND INER	-
. Initial entry procedures:	EFING WORKSHEET
_/	
Used main entrance DEnt	ered during normal operating hours
	temperate and application of the college
- Facility Representative(s): DYVAN E. Ku	TITLE: Myr. Frut Haz. Photos.
Rud Paray SHEA Joseph Haal	
Barb Perry, SHEA Joseph Haar Specialist III Alfred DMd olow	
	imate knowledge of all aspects of the
generation and management practices? GYE (How was this verified?)	S O NO
15 m	
. How long has facility representative worked	
. Were unreasonable or excessive delays encoun	tered (>15 minutes): TYES Find
Introduction:	
Presented credentials	
E Verified presence at correct facility (	charled address (a.e.
Explained authority to conduct inspecti	
Explained the purpose, scope, and order	
Explained documentation process through photo's, notes, statements, etc.	the use of worksheets shockline
	The state of the s

Explained facility's right to claim CBI and provided pages 1 and 2. of CBI form for signatures

Identified personal safety considerations: stry glasses

Explained that findings and observations are based on your current knowledge of RCRA and that the final findings may differ

7. Was full access granted? TES By who? (name): Bryan Kurry & Joseph Haalte

Obtain name of person denying access, time of denial, reason for denial, or note limitations placed on access: □ NO

DOCUMENTATION:

HOW are the facts known?

WHO said what? WHEN did it whappen? and WHAT PROOF WAS OBTAINED?"

. no. sostito - whhendry rer	of of 1
civity #:	Page Of
FACILITY BACKGR	OUND WORKSHEET
Site history:	6 30, bld 276 purchas
Date facility began operating: in 1980's	
Number of shifts/hours worked: 2-pd	Number of days worked per week:
Size (sq. ft., how divided):	Sypus
Property owner and facility operator the	e same? E TES D NO
	Blog 276 + sine
Major products or services provided: Advan	wal many facturing of - prove out
manufacturing processes before they are	
	7
Major raw materials used: composites tites	0
Muchaulie oil	villen , activition, cotting oil, chilling me
Mychaelteory	
Vaina and Santa	
Major manufacturing or processing operatio (provide brief description)	ons which generate waste streams:
<u>Operation</u>	Waste Stream(s)
Operation	4
aloding process	Maste Stream(s)
alocling process culting oil from outling	Inromic acid wasto
alodine process	A
alodine process	Maronic acid wasto
aloding process culting oil from willing	used oil  waste paint related material
aborling process cutting oil from willing according of from willing composite bayering (graphite trusin)	used oil wasto wasto as oil wasto said related material
aboling process cutting oil from willing composite layering (graphite Presin)	used oil wasto wasto as oil wasto said related material

Activity #:				Page 9 of 2
6. Verified/compared above info	ormation with	facility Notifi	.cation Porm:	Page of
De King said used sols	vent in vapo	on Degreases .	ves storage	in 1998 f
replace with, a non	1-hagardon		1 1	e vapor Degrasse
	-			a.) (d)
7. GENERATOR STATUS: CE (C (based on records review)	//////////////////////////////////////	//////////////////////////////////////	//////////////////////////////////////	//////////////////////////////////////
Is facility's status soli (If not carefully verify	dly within aboatatus and do	ove category?	D-YES D NO	
. TSD STATUS:   Treatment		□ Dieposal	nome original re	•
Note: Types of units, number	of units, car	pacities, proce	sses, etc.	
3		Leggle governor		
. Resolved questions from Pre-	//////////////////////////////////////	rksheet?   YE	S ONO DING	/////////////////// Questions
	X I	Marine - 100 / / 100 / 1	14 (19) (19) (19) (19) (19) (19) (19) (19)	
	2001			
O. Resolved compliance officer	s questions fr	com Pre-Inspect:	ion Worksheet?	E TES O NO Ouestion
		to the first transition of the		7,4
1. Requested site map or diagra	am to identify	all observation	ons? Ares	O None available

Activity #:\_\_\_

Facility Status: SQG SLQG SI.S./P

Page 10 of 2

# RECORDS REVIEW WORKSHEET AND CHECKLIST

## A. MANIFESTS

1. Location of manifests: in office area of Env. \* Haz. Materials Services
2. Person(s) responsible for manifests: J. Heake blbg. 226

	//x	REGULATORY REQUIREMENT	MANIFEST S's AND CONCERTS
3.	1	Facility uses manifest system-262.20(e)	
4.	V	Manifests maintained for 3 years-262,40(a)	
5.	V	Generator EPA 1.D. number-262.20(a)	
6.	V	Generator name, address, phone number-262.20(a)	
7.	1	Transporter(s) name & EPA 1.D. number-262.20(a)	
8.		Designate facility name, address, phone number, 2 EPA 1.D. number-262.20(a)	
9.	X	Alternate facility designated-262.20(c)	
10.	/	Five digit document number-262.20(a)	
11.	0	DOT shipping name, hazard class, waste code, & RQ (if required-49 CFR 172)-262.20(a)	
12.	V	Containers: numbers, type, quantity, unit wt/vol262.20(a)	
13.	0	Proper certification including waste minimization-262.20(a)	
14.	1	Signed and dated-262.23(a)	
15.	N/A	Exception report submitted if necessary-262.42	
16.	NA	Vaste reclaimed under contractual agreement (SGG only)-262.20(e)(1)	
17.	n//2	Generator maintains copy of contractual agreement (SQG only)-262.20(e)(2)	
18.		LDR notification/certification sent with all manifests or (1st shipment under tolling agreement, SQG only)-268.7(a)	
19.	V	LDR notification/certification includes: manifest number, correct EPA waste codes & treatment standards, and waste analysis data- 268.7	
20.	V	LDR notification/certification maintained for 5 years-268.7.(a)(7)	

21. Approximate number of manifests generated since last inspection past 3 years

22. Approximate number of manifests reviewed: 29

23. Copies of manifests made with regulatory violations? TYES ANO

24. Biennial Reports submitted per 262.41? TYES

DOCUMENTATION	HOW are the facts known? WHO said what? WHEN did it happen?
	HOW long did it happen? and WHAT PROOF WAS OBTAINED?

Activity #:	Page   or
23. HW Marufests this year?	
10/6/90; (blast medd of 7 Dr (2000 16)	
10/27/97 DOUT, DEST I Dr (4/bc/ 1/b)	
7/21/99 blait melle 3 der (210015)	
7/28/99 chronicus 1 dr 4974	
6/16/99 blact media 4de 3,000	
1/2x/98 wastopainted 1 4646.	
in blustmedra 3et 270016	
3/17/99 Wheek wells 5ch 4,000 Hs	
1/21/99 wpand rel ldr 464 16	
2/16/9x Washmedia 3dr ZlW1h	
a treat get to	100601
	ne see see

SOP	2321.	1B	_	Appendix :	1-8

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Activity #:

Facility Status: | SQG | D LQG | D I.S./P

Page 12 of 21

# D. PERSONNEL TRAINING

(SQG - N/A, LQG's-262.34(a)(4) referencing 265.16, I.S.-265.16 only)

1. Location of personnel training records: in all

2. Person responsible for personnel training records: Perry

3. Person responsible for conducting the personnel training: Carb Perry

	1/2	REGULATORY REQUIREMENTS	COVERS
4.	1	Program director trained in hazardous waste management procedures-265_16(a)(2)	
5.		Employees do not work trisupervised without completing training & are trained within 6 mo	
6.	L	Job title & name of person filling position specified=265.16(d)(1)	
7.	U	Written job description including: skills, education, qualification, and duties— 262.16(d)(2)	
8.	V	Written description of type and amount of introductory & continuing training provided- 265.16(d)(3)	
9.	/	Training covers: response to emergencies, implementation of contingency plan, use of alarms, waste feed cut-offs & other emergency equipment, as required-265.16(a)(3)	
10.	_	Documentation confirming training has been completed-265.16(d)(4)	
11.	4	Records maintained on-site & for 3 years- 265.16(d) & (e) respectively	

** Properties - Please note applicable permit requirements
12. Notes/Observations: Ruy on supervisor to ille til A
Newstrand based on ab dansfrateins of marked a
Carl Berry miel she checks data love frequentles ( coorbus
with it chiles & will see welve or when
(BBerry tediles RCRA Hauterment & DOT averents)
1 10 / averents)

HOW are the facts known? WHO said what? WHEN did it happen? HOW long did it happen? and WHAT PROOF WAS OBTRIBED?

		Facility Status:	O SQC DIQC O I.S./P	Page 71 of
. PF	REPA	REDNESS AND PREVENTION		
**	Name -	of designated Emergency Coordinator(	Bryan Kury	
	//x	RESTRATORY RESULT OF DATE	COMPITE	
		Arrangements with Local emergency agencies made- 262.34(d)(4)-265.37 [SQG] or 262.34(a)(4)-265.37 [LQG, 1.8.]		
	1	Emergency coordinator on presiss or or cattle 262.34(d)(5) [SQG1 or 262.34(a)(4)-265.55 [LOG; 1.5.]		19
in ca	POL 1 AND	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		

Description of actions needed to respond to fires, explosions, or releases of hazardous waste-265.52(a)  Description of arrangements with local emergency agencies, as appropriate-265.52(c)  List names, addresses & phone numbers (both home and office) of emergency coordinators & designate primary EC-265.52(c)  List & describe emergency equipment, its location and its capabilities, as required-265.52(e)  Include complete evacuation plan, if required-265.52(f)  Expense Plan ".  Expense Plan ".  Expense Plan ".  Expense Plan ".		/6	TS CONVEINS
Contingency plan spintained on-site-265.53(a)  Plan submitted to emergency response aperciee-265.53(a)  Plan submitted to emergency response aperciee-265.53(a)  Description of actions needed to respond to fires, explosions, or releases of hazardous waste-265.52(a)  Description of arrangements with local emergency apercies, as appropriate-265.52(c)  List names, addresses & ponce numbers (both home and office) of emergency coordinators & designate primary EC-265.52(c)  List & describe emergency equipment, its location and its capabilities, as required-265.52(e)  Include complete evacuation plan, if required-265.52(f)  Emergency coordinator must be thoroughly familiar will all aspects of facility-265.55  To compliance X-not in compliance N/A-not applicable permit requirements		Has contingency plan-265.51(a)	
Plan substited to emergency response agencies-265.53(a)  Description of actions needed to respond to fires, explosions, or releases of hazardous waste-265.52(a)  Description of arrangements with local emergency agencies, as appropriate-265.52(c)  List names, addresses & phone numbers (both home and office) of emergency coordinators & designate primary EC-265.52(c)  List & describe energency equipment, its location and its capabilities, as required-265.52(e)  List & describe energency equipment, its location and its capabilities, as required-265.52(e)  List & describe energency equipment, its location and its capabilities, as required-265.52(e)  Emergency coordinator must be thoroughly familiar will all aspects of facility-265.55  In compliance X-not in compliance N/A-not applicable * please note applicable permit requirements		Contingency plan minteled energi	*=====================================
Description of actions needed to respond to fires, explosions, or releases of hazardous waste-265.52(a)  Description of arrangements with local emergency agencies, as appropriate-265.52(c)  List names, addresses & phone numbers (both home and office) of emergency coordinators & designate primary EC-265.52(c)  List & describe emergency equipment, its location and its capabilities, as required-265.52(e)  Include complete evacuation plan, if required-265.52(f)  Emergency coordinator must be thoroughly familiar will all aspects of facility-265.55  In compliance X-not in compliance N/A-not applicable " please note applicable permit requirements	• 4	Plan submitted to emergency respo	
tist names, addresses & phone numbers (both home and office) of emergency coordinators & culdresses of suggestive coordinators and its capabilities, as required-265.52(e)  1. Include complete evacuation plan, if required-265.52(f)  2. Emergency coordinator must be thoroughly familiar will all aspects of facility-265.55  In compliance X-not in compliance N/A-not applicable . please note applicable permit requirements		fires, explosions, or releases of	respond to hazardous
List names, addresses & phone numbers (both home and office) of emergency coordinators & coloresses of engages us toordenators and included in SFP "Spill Prevent & Response Plan".  Include complete evacuation plan, if required-265.52(f)  Emergency coordinator must be thoroughly familiar will all aspects of facility-265.55  The compliance X-not in compliance N/A-not applicable permit requirements		Description of arrangements with agencies, as appropriate=265.52(c	iceal cargancy yes of me fine plan for bld 276 is
required=265.52(e)  10. Include complete evacuation plan, if required=265.52(f)  Signature coordinator must be thoroughly familiar will all aspects of facility=265.55  -in compliance X-not in compliance N/A-not applicable - please note applicable permit requirements		home and office) of emergency coo	
Exergency coordinator must be thoroughly familiar will all aspects of facility-265.55"  -in compliance X-not in compliance N/A-not applicable - please note applicable permit requirements		location and its capabilities, as	nt, its # Response Plan".
-in compliance X-not in compliance M/A-not applicable * - please note applicable permit requirements	0.	Include complete evacuation plan, required-265.52(1)	if
-in compliance X-not in compliance M/A-not applicable * - please note applicable permit requirements		Exergency coordinator must be the familiar will all aspects of faci	troughty (1)

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. IN	ISPE	ECTIONS		
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		stion of inspection records: Mc//2		
2.	Pers	son(s) responsible for conducting ins	ections: Persons in	Fru + laca
		son(s) responsible for conducting lines services = 20 in logot Sanly 3m	feretramed to lot	the inspection
0	//z	REGULATORY REQUIREMENTS	COME	ars .
	-	Written schedule for inspecting & monitoring safety, emergency, security, operating & structural equipment-265.15(b)(1)		
		Schedule maintained at facility-265.15(b)(2)		
		Schedule identifies all types of problem looked for and frequency of inspections-265.15(b)(3-4)		
		Facility remedies all problems found-265.15(c)		
		Schedule identifies the name of inspector, the date & time of inspection, & the date and nature of receirs-265.15(d)		
		Inspection records maintained for 3 years- 265.15(d)	V	
9.		nce X-not in compliance X/A-not applicable " arvations:	please note applicable permit	requirement
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Pacility Status: | SQG | LQG | I.S./P

# VISUAL REVIEW WORKSHEET AND CHECKLIST

(Complete one form per storage area)	
1. Name and location of area:	/ - / /
2. Person responsible for area:	J

3. Type of storage area: □ < 180 day □ < 270 day □ I.S. □ < 90 day [ Permit 4. I.S. capacity: Permited capacity: //x REGULATORY REQUIREMENTS COMMENTS L Date of accumulation marked-262.34(a)(2) 1 6. Containers marked as "Mezardous Waste". 7. Containers in good condition-262.34-265.171 8. Containers are compatible with waste-262.34-265.172" 9. Containers kept closed-262.34-265.173(a) (dry blast media). Probably sloppedover 10. Containers opened, handled, & stored in a manner not to cause them to leak-262.34-265.173(a) 11. Containers storing incompatible separated or protected form each other-262.34-265.177 appears closer on west side there or tracks. measured: 12. Containers stored >50 feet from property line (LQG's, I.S. & Permit, only)-262.34-265.176 13. Adequate misle space for type of container management and emergency equipment used-265.35 bldg = 229'> Frack 14. Containers stored for less than 90/180/270 days, as applicable-262.34 60 15. Facility inspected weekly-265.174 ADDITIONAL I.S. REQUIREMENTS\* 16. Security: controlled entry, 24-hr. surveillance, or barrier-265.14(b) 17. "Danger Unauthorized Personnel Keep Out," signs posted-265.14(c) proper by 18. "No Smoking" signs conspicuously posted-Tine distance 265.17(a) from bld 274 19. Containers/Tanks clearly marked identifying their contents: 4 with storage start date-268.50(a)(2) 20. LDR westes not stored over 1 yr. without adequate justification-268.50(c) 21. Daily inspections loading.unloading areas (when in use)-265.15(a)(4) PRE-TRANSPORT REQUIREMENTS\* Waste packaged, labeled, marked, per DOT-262.30, 262.31, 262.32, respectively 22. 23. Placards available for use by transporters-262.33

X-not in compliance M/A-not applicable " - please note applicable permit requirement

/- In compliance

DOCUMENTATION;

How are the facts known?

WHO said what? WHEN did it happen?

B. SATELLITE ACCUMULATION AREAS	В.	SATE	TILE	ACCUMUL	ATION	ARFA	21
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- 1. Total number of satellite areas at facility: 3
  - 2. Person who has overall responsibility for satellite waste management:
  - 3. Please note your observations and findings below:

	REGULATORY REQUIREMENTS	SAT	SAZ	SAS	SA	ear					
4.	Area at or near the point of generation- 262.34(c)(1)	V	-/	/		20	242	SA7	SAS	539	2470
5.	Area under the direct control of operator- 262.34(c)(1)		-/			, 31,					
6.	galions or 1 quart (acute) -262.34(c)(1)		-	-							
7.	Excess accumulation removed within 3 days-										
8.	Containers marked identifying their contents- 262,34(c)(1)						A SEC.				_
9.	Containers in good condition-262.34(c)(1)										
10.	Containers are compatible with waste- 262.34(c)(1)									$\dashv$	
in c	Containers kept closed-262.34(c)(1)					-	-				

Satellite Area - SA1:

Name/Location of area: outside paint noom SBZ76-01
Person responsible for area:
Type(s) of waste accumulated: paint waste
Number and Type of containers: ( ) >-(s)
How were container volumes verified? ~ 721111
Photos taken?   YES   No Photo numbers:
Area noted on map or diagram:   Yes   NO
Notes/Observations: Natural 2/15/99
THE REPORT OF THE PARTY OF THE
THE TO INCOME IN NATIONAL PROPERTY OF THE PARTY OF THE PA
DOCUMENTATION: BOW are the facts known? WHO said what? WHEN did it happen? and WHAT PROOF WAS OBTAINED?

Activity #: Pacility Status: 0 SQC D1QC 0 I.S./P Page 9 of 2
Satellite Area - 822: Name/Location of area: Elo Alodinearea
Person responsible for area:
Type(s) of waste accumulated: Aluline waste
Number and Type of containers: 155-61
How were container volumes verified? " /s full tangelon sile
Photos taken?   YES   No Photo numbers:
Area noted on map or diagram: 1/Yes 1 NO Notes/Observations: 41/9/9/9/9/9/9/9/9/9/9/9/9/9/9/9/9/9/9/9
Top you ve want to Beaugasta an amount of brought and a second of the control of
Satellite Area - SA3:
Name/Location of area: ab 126
Person responsible for area:
Type(s) of waste accumulated: worth pulluric acid
Number and Type of containers: / 5-1-4 ~
How were container volumes verified? - 4/3 full
Photos taken?
Notes/opservations: Natel 2/ something/89 relocated to storage sheet by 11/17/99. Put container on chaomic weil villed sheet
Satellite Area - 5A4:
Name/Location of area:
Person responsible for area:
Type(s) of waste accumulated:
Number and Type of containers:
How were container volumes verified?
Photos taken?
Area noted on map or diagram:   Notes/Observations:
The state of the s

Page 93 of	IO
Page ZO	2

Activity #:	Pacility Status:	□ soc	E LOG	□ I.S./P

## EXIT BRIEFING WORKSHEET

#### 1. Initial procedures:

- Reviewed all data collection worksheets, checklists, field notes, and collected documents to ensure that all necessary information has been collected and documented. This review included the following:
- Documentation of the location of the violation, the type and amount of waste involved, the duration or time frame of the violation, the specific dates when the violation first started occurring, and the number of times or frequency that the same violation was found at the facility.
- Documentation regarding illegal waste management units, including: information about the units location (diagram/picture), its dimensions, its conditions, the

information.
- Documentation regarding illegal disposal situations, including: information about each occurrence, eg. where the waste was sent or disposed of, how it was shipped, who shipped it, when it was shipped or disposed of, how much was shipped or disposed of, how the waste was managed at the disposal site (land disposed, burned, etc.).
Identified/verified violations from previous inspection were corrected (if applicable)
Note additional information needed and/or questions for facility representative(s):
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Prepared Notice of Violation (NOV) form, if applicable
Prepared Document Receipt form
Pollution Prevention Checklist completed
Multi-Media screening completed, media(s): 17 MM
2. Exit Briefing:
Addressed all unresolved inspection related issues
Provided facility with Document Receipt  (Provided facility with Page 3 of CBI form (only if facility makes a CBI claim)
Provided facility with Page 3 of CBI form (only if facility makes a CBI claim)
Explained that the findings and observations resulting from the inspection were based on your current knowledge of RCRA and that the final findings may
Explained that the compliance officer will make the final compliance decisions regarding the findings and observations of the inspection and that all compliance related questions should be directed toward them
Explained that any recommendations provided during the inspection are for informational purposes only and DO NOT require specific actions by the facility
Summarized the findings and observations for the facility representatives

EXBW-1 of 2

Act.	ivity	#:				Facil	ity s	Status:	□ soo	D LO	<b>5</b> 0 1	.s./P		Page 21 o	<u> 2</u> [
3. :	Notic	of	Violat	ion	prepa	red an	d iss	sued?	EYES	- □ NO		(If ye	s compl	ete below)	
		ill v	iolati mstano	ons	were locat	clearl ion, a	ly ide	entifie de appl	d and o	explaine regular	nd. ir			-	
	1	Expla	ined t	he i	mport	ance c	of a t	timely	and ade	quate:	respor	150			
4.	Speci: (Note:	fic i R <b>e</b> q	nforma Nest :	tion 11 i	requanta nicorn	ested ation	from in wr	facili riting	ty? and cop	PY)	O Y	es e	No		
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	grone	Ly	line	107	conti	ble	H W	More	ž						
6.	Facil staff	ity a	ppear D YES	to O	have NO	aware	ness	of RCRA	regul	ations	and/o	r has	its own	environme	nta
					· · · · · · · · · · · · · · · · · · ·					E .				· · · · · · · · · · · · · · · · · · ·	-
7.	Facil	ity a	ppear	s to	have	little	e to	no know	vledge	of RCRA	.7 🗆	YES	□ ио		
8.	Facil	ity h	as co	py o	f appl	icable	e reg	ulation	18?	· · · · · · · · · · · · · · · · · · ·	.2	YES	□ мо		
9.	Note	attii	tude a	nd de	emeanc	or of :	facil	ity rep	present	ative(s	) if			Ø-N/A	
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